Inspector Worksheet - ENSV FY05
Inspection Transmittal Form

Todays Date: 11/9/2005

CC 1/4/05 Lws 1/4/2006

INSPECTION ACTIVITY

Media	Type of Inspection	Targeting Rationale	Compliance Officer	Inspection Date
RCRA	CEI	LQG (KS,MO,NE)	Aycock, J	12/6&7/05

Inspector	Activity #
Urban- T	

FACILITY INFORMATION

Facility Name	ID Number	NAICS/SIC Code
Northrup Grumman Interconnect Technology	MOD007152903	334418

Address	City	County	State	ZIP
4811 W. Kearney	Springfield	Greene	MO	65803

Facility Activity: Printed circuit assembly mfg

INSPECTION FINDINGS

NOV/NOPF Issued? (X) Yes ( ) No ( ) N/A Potential SNC? ( ) Yes (X) No ( ) N/A

Preliminary Findings (briefly list regulatory deficiencies)

1) 10 CSR 25-5.262(1) - Failure to Keep Satellite accumulation containers closed.
2) 10 CSR 25-5.262(1) - Failure to Mark/Identify & place start Dates on Satellite Accumulation Containers
3) 10 CSR 25-5.262(1) - Failure move satellite Container to Storage area & Keep it near Point of generation
4) 10 CSR 25-5.262(2)(B) 1&2 - Failure to provide license Plate #s & specific gravity on manifest
5) 10 CSR 25-5.262(1) - Failure to have written Job descriptions for employees performing Hazardous waste management

Comments:

MULTIMEDIA FINDINGS

MM Participating Program*	MM Level	MM Type
	B	

Potential EJ? ( ) Yes (X) No ( ) N/A

MM Screening completed? (X) Yes ( ) No ( ) N/A

SBREFA handout provided? (X) Yes ( ) No ( ) N/A

If yes, was MM Screening Checklist forwarded? ( ) Yes (X) No

If yes, who? > [ ] CAA [ ] EPCRA/TSCA [ ] SPCC [ ] CWA [ ] UST [ ] PWS [ ] UIC [ ] Wetlands [ ] RCRA [ ] CFC [ ] EJ [ ] All

* A=CAA, W=CWA, R=RCRA, E/T=EPCRA/TSCA, U=UST, C=CFC, S=SPCC, U-I=UIC, Wet., PWS, All

QUALITY OF INSPECTION TARGET

Do you feel this facility was well targeted and worth inspecting? (briefly explain why or why not)

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

AT

NORTHROP GRUMMAN INTERCONNECT TECHNOLOGIES
4811 West Kearney
Springfield, Missouri 65803
(417) 829-5350
EPA ID Number: MOD007152903

ON

December 6 - 7, 2005

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

1.0 INTRODUCTION

At the request of the Air, RCRA, and Toxics Division (ARTD), a RCRA Compliance Evaluation Inspection was conducted at the Northrop Grumman Interconnect Technology in Springfield, Missouri, on December 6 - 7, 2005. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. This report and attachments present the inspection results. This inspection was conducted as a Level B Multi-Media Inspection and the Multi-Media Screening Checklist is included as attachment 1.

2.0 PARTICIPANTS

Northrop Grumman Interconnect Technologies (Northrop):
Jami Gay, Environmental Engineer
Richard Baker, Engineering Supervisor
Tom Lyles, Environmental Control Senior Technician
Henry Cook, Operator (PISM)
Ron Hammons, Supervisor (PISM)
Audie Luna, Process Engineer
Brian Thompson, Safety Engineer
Bill Moore, General Manager (exit briefing only)
Steve Vetter, Director of Engineering (exit briefing only)

U.S. Environmental Protection Agency (EPA):
Trevor L. Urban, Environmental Scientist

3.0 INSPECTION PROCEDURES

Upon arriving unannounced at the facility (9:00 am), I informed the secretary at the front desk of my inspection and requested to speak with Ms. Jami Gay. The secretary contacted Ms. Gay and informed her of my presence. Ms. Gay soon arrived and I presented my credentials and explained both the purpose of the inspection, and the procedures I would follow during the inspection. I followed Ms. Gay to a training room where she contacted Mr. Richard Baker and Mr. Tom Lyles and we awaited their arrival to begin the entry briefing. Once Messrs. Baker and Lyles arrived, I presented my credentials and explained to Ms. Gay and Messrs. Baker and Lyles both the purpose of the inspection, and the procedures I would follow during the inspection. I then made them aware of their confidentiality rights and informed them that a Confidentiality Notice, which they reviewed, would be provided at the end of the inspection to make any claims. I also provided them with a copy of U.S. Federal Code 1001 and 1002 pertaining to false statements and documents, which they reviewed and returned. Ms. Gay acted as the official facility representative during the inspection. Ms. Gay stated that she had been the Environmental Engineer of the facility for approximately 3 years. Mr. Baker stated that he had been the Engineering Supervisor since September of 2000. Mr. Lyles stated that he had been the Environmental Control Senior Technician since February 1997.

The inspection consisted of a discussion of facility operations, waste generation and waste management practices, a review of waste management records, and a visual inspection of the waste generation and management areas. Ms. Gay accompanied me during the entire facility inspection and provided most of the facility waste generation information. Messrs. Baker, Lyles, Luna, Cook and Hammons also provided information during the inspection which was specific to their process areas.

I completed my inspection and summarized the findings and recommendations on December 7, 2005, with Ms. Gay and Messrs. Baker, Luna, Thompson, Moore, and Vetter. During the exit briefing, Ms. Gay acknowledged receipt of the following by her signature: a Confidentiality Notice, which she signed indicating no confidential business information had been provided during the inspection, a Receipt for Documents and Samples, and a Notice of Violation (NOV) (see attachments 2 through 4). Six photographs were taken during the inspection (see attachment 5 for the digital image chain of custody, photo log and photos #1 - #6).

4.0 FACILITY DESCRIPTION

4.1 Facility Information and Operations

Northrop manufactures printed circuit boards and is located on the northwest side of town, directly east of the airport. The Springfield facility has been in operation since 1964 and has approximately 250,000 square feet under roof (see attachment 6). Northrop currently has approximately 330 employees working two, eight hour shifts, five days per week.

The facility receives copper coated laminate as a raw product, sheers the material to size, computer drills the boards, then performs dry film imaging. The boards go through an electro-less copper plating procedure to set a specific thickness of copper prior to transfer to an electrolytic copper plating operation for final application. These plating operations involve a series of tanks containing cleaning agents, rinses and oxidizers. The wastewaters from the operations are directly plumbed to one of two wastewater pretreatment systems.

After the boards are copper plated, they are solder plated, the film is removed and the excess copper is etched in an ammonium chloride etchant. The waste etchant is plumbed directly to a non-hazardous waste storage tank located next to the facility wastewater treatment plant (WWTP). The etchant is then loaded into tank trucks and directly reused by Heritage Environmental Services at a micro nutrient facility located in Indiana.

For those boards requiring gold tipping, this process is performed following the etching. The boards are then solder masked, routed, inspected and prepared for shipment. Wastewaters from the gold tipping process are also directly plumbed to one of two wastewater pretreatment systems.

Multi-layered boards go through similar processing, but are stacked and laminated prior to routing and fabrication.

4.2 RCRA Status

Northrop is a large quantity generator (LQG) of D001, D002, & D008 characteristic and F003 & F006 listed hazardous wastes. Northrop's 2003 biennial hazardous waste report indicated that Northrop is operating as an LQG (see attachment 7). Ms. Gay provided me with a copy of the hazardous waste manifest log for 2005 and the waste minimization report for 2004 for review (see attachments 8 & 9). An example of the types and amounts of hazardous waste shipped since October of 2005 are shown on the hazardous waste manifests #s 1008 - #1012 (see attachment 10). A review of their current generation rates indicates that Northrop has been and is currently an LQG of RCRA hazardous waste. Based on the past and current generation rates of known hazardous waste, I determined Northrop to be an LQG (greater than 1000 kg/month) of characteristic and listed hazardous wastes, as well as an used oil and universal waste generator, at the time of the inspection.

4.3 Facility Wastes

Northrop generates the hazardous and non-hazardous wastes listed below. This information was obtained from the 2002 through 2005 hazardous waste shipments and statements made during the inspection. Areas visually inspected include Design, Etch, Strip (DES); Drill Room; Assembly Operations (AO); Audit (QA/QC); Auto #1 -#4 Plating Lines; PISM; Halco; WWTP; Hazardous Waste Storage; and the Environmental Labs.

Plating Waste - Northrop has several plating operations throughout the facility. Wastes generated in the plating operations are hard piped to the WWTP for treatment and then discharged to the Springfield municipal sewer system. During the visual inspection I observed several plating operations. The waste streams most often generated in these areas are corrosives and heavy metal bearing wastes. I observed no apparent violations in the plating areas.

WWTP Sludges - WWTP sludges (F006/D008) are generated from the treatment of wastewaters prior to discharge to the Springfield municipal sewer system. Wastewaters from the board preparation processes are directly plumbed into either the acid/batch disposal or the rinse/flow through wastewater treatment systems.

The batch treatment process is used to treat the more highly contaminated waste waters (acids and organics). Ms. Gay provided me with the Material Safety Data Sheet (MSDS) for Envirostrip 785 which is used in the auto #4 plating line as an example of types of chemicals that may be sent to the WWTP (see attachment 11). This system consists of six tanks in which treatment chemicals (sodium sulfide and a proprietary compound) are added. After mixing, the sludge is allowed to settle and the water is filtered through one micron filter bags prior to discharge. The sludges are piped to a sludge thickening tank, polymers added, filter pressed, dried, collected in cubic yard PVC totes lined with a plastic bag (see photo #2). A cubic yard PVC tote of sludge is generated approximately every 36 hours, or approximately three to four totes per week.

The rinse/flow through system treats the less highly contaminated wastes. Wastes are plumbed into an initial 10,000 gallon collection tank then to a 17,000 gallon tank for pH adjustment to 9.8. Under gravity flow, the waste is piped to a clarifier where solids initially settle, sludges are piped to settling tanks, and allowed to thicken prior to going through the filter press and drier. A cubic yard PVC tote of sludge is generated approximately every 72 hours, or approximately two to three totes per week.

Approximately 271 cubic yards of F006/D008 hazardous waste WWTP sludge were generated in 2004 and shipped to World Resources Company located in Tolleson, Arizona.

Ammonium Chloride Etchant with Hydroxide - As stated above, after the printed circuit boards are copper plated, they are solder plated, the film is removed and the excess copper is etched in an ammonium chloride etchant with hydroxide. The ammonium chloride etchant with hydroxide has a pH of approximately 9.75 as new product and is considered spent when the pH is approximately 8.0 - 8.5. The spent etchant is plumbed directly to a 6,000 gallon non-hazardous waste storage tank located next to the WWTP in the bulk ammonia storage area (see attachment 6). The spent etchant is then pumped into tank trucks and directly reused by Heritage Environmental Services at a micro nutrient facility located in Indiana. This spent etchant is generated at a rate of about 5,000 gallons per month. Sixty thousand gallons of the spent etchant were shipped during the calendar year of 2005. After the inspection, Ms. Gay provided me with additional information/documentation to support Northrop's solid waste exemption for the spent

etchant (see attachment 12).

According to the previous inspection report, the spent etchant was managed as a D002 characteristic hazardous waste in the past. Mr. Luna, Process Engineer for one year - five years at the facility, stated that the hazardous waste tanks that were used to store the hazardous waste etchant in the past, were removed and replace with current tanks being utilized for the non hazardous spent etchant in 1996/1997. Mr. Luna stated that he thought Northrop was required by the state to close out the hazardous waste tanks per 40 CFR 265.197(a) & (b), but could not provide me with any documentation.

Acetone Contaminated Rags - Acetone contaminated rags are generated throughout the facility from wiping the circuit boards during inspection and cleaning prior to soldering. The acetone contaminated rags are managed as an F003 hazardous waste and are collected in day cans and satellite accumulation containers. Approximately three 55-gallon containers of acetone contaminated rags are generated monthly and disposed of via Safety-Kleen Systems Inc. (S-K) located in Denton, TX. During the visual inspection, I observed a satellite accumulation container not closed, labeled or dated, located in the PISM area of the facility (see photo #1). The container was full and lid appeared to be bent/sprung thus not allowing it to close. I spoke with Mr. Henry Cook and Mr. Ron Hammons who work in the area and they stated that the container is emptied when it is full or at the beginning of the next shift. Based on this information, I determined the container to be a satellite accumulation container and not a day can as it may not be emptied daily. I informed Ms. Gay and Messrs. Cook and Hammons that a satellite accumulation container must be closed, labeled and dated, and a day does not require a start date if emptied daily or at the end of each shift.

NOV #1 - Failure to keep the satellite accumulation closed unless adding or removing waste is in violation of 10 CSR 25-5.262(1) per 40 CFR 262.34(c)(1)(i) ref 40 CFR 265.173(a).

NOV #2 - Failure to mark/identify the contents of the satellite accumulation container and place the accumulation start date on the container is in violation 10 CSR 25-5.262(1) per 40 CFR262.34(c)(1)(ii) as modified by 10 CSR 25-5.262(2)(C)3.

Sulfuric Acid Contaminated Debris - As stated above Northrop has several plating areas in the facility. Sulfuric acid contaminated debris (D002) is generated from cleaning and maintaining the plating lines on a daily basis. The sulfuric acid contaminated debris is collected in satellite accumulation containers throughout the facility and when full transported to the hazardous waste storage area inside the WWTP. Ms. Gay did not know the generation rate but stated the waste is disposed of by S-K.

Lead Contaminated Rags/Filter s Debris - Waste lead contaminated filters from the electrolytic copper plating bath are accumulated and considered a D008 hazardous waste. Lead

contaminated rags are generated in the QA/QC and other areas of the facility when the circuit boards are wiped/cleaned when performing soldering activities. Ms. Gay estimated that one to two 55-gallon containers of D008 hazardous waste rags and filters are generated monthly. The D008 hazardous waste is disposed of by S-K.

Paint Waste - During the visual inspection, I observed a 55-gallon satellite accumulation container of (D001) hazardous paint waste in the WWTP sludge press room (see photos #2 & #3). Ms. Gay stated that paint waste is generated throughout the facility and that employees had been bringing many small containers of D001 paint waste and accumulating the waste in the sludge press room. Ms. Gay stated that the Environmental Control personnel had consolidated the paint waste into the 55-gallon container which was closed, labeled and dated 9/26/05. Ms. Gay stated that the consolidation of the small containers must have occurred on 9/26/05. The container was approximately half full and the Environmental Control personnel stated that they have only added minimal amounts of paint waste since that time. I informed Ms. Gay that a satellite accumulation container must be at or near the point of generation to meet the satellite container exemption. I also informed her that a satellite accumulation container must be managed as a storage container within three days of becoming full or no longer meeting the satellite accumulation container definition.

> **NOV #3 - Failure to store the 55-gallon satellite accumulation container of paint related waste at or near the point of generation and move the satellite accumulation container to a hazardous waste storage area within three days of it no longer meeting the satellite accumulation container definition is in violation of 10 CSR25-5.262(1) per 40 CFR 262.34(c)(1) & (2).**

I further explained that the act of the employees bringing the small containers of hazardous paint waste to the WWTP sludge press room would be considered performing hazardous waste operations and require them to be included in Northrop's RCRA training program. Ms. Gay stated that she would move the container to the hazardous waste storage area located in the next room of the WWTP and that non-trained employees would no longer be allowed to bring the paint waste to the WWTP area.

Coincidently, the container was included on the Weekly Environmental Inspection form and was therefore being inspected weekly as a point of generation (POG) container. However, the 55-gallon satellite accumulation container is actually a hazardous waste storage container and must be managed as such. The container was not identified in the contingency plan and not included in Northrop's RCRA training plan as an area designated for hazardous waste storage and management.

Laboratory Waste - Laboratory waste is generated in two laboratories from the operation of analytical equipment. The waste is collected in a 5-gallon plastic container. Once the container becomes full it emptied into the WWTP and treated. Mr. Lyles did not have a generation rate for the laboratory waste and stated that it depends on the frequency/use of the analytical equipment.

During the visual inspection of the environmental laboratory located in the WWTP, I observed a 5-gallon plastic container of waste not labeled or dated (see photo #6). I asked if the waste was hazardous and Mr. Baker stated that it was HNO3 and water and may or may not be D002 hazardous, but they treat it as D002 hazardous waste to be sure. I asked Mr. Baker if they could check the pH of the waste and they did. A check of the pH confirmed that the waste had a pH of less than 2 and was a D002 hazardous waste.

NOV #2 - Failure to mark/identify the contents of the satellite accumulation container and place the accumulation start date on the container is in violation 10 CSR 25-5.262(1) per 40 CFR262.34(c)(1)(ii) as modified by 10 CSR 25-5.262(2)(C)3.

Scrap Printed Circuit Boards - Scrap printed circuit boards were once treated as D008 hazardous waste, but are now recycled and shipped to World Resources Company located in Tolleson, Arizona for reclamation. Approximately 200,000 pounds of scrap printed circuit boards have shipped for recycling in 2005.

Drill/Router Dust - Circuit boards are drilled and routed in the drill room. The dust generated from the drilling and routing is collected using a dust collection system and is considered to be non hazardous. Ms. Gay stated that the drill/router dust is added to the scrap printed circuit boards waste and recycled.

Aprons/Gowns/Booties - The clean room generates aprons, gowns and booties contaminated with lead. Ms. Gay stated that the aprons, gowns and booties are laundered weekly by Aramark Inc.

Universal Waste Lamps - Northrop collects spent flourescent lamps and manages them as a universal waste. The universal waste lamps are collected and stored in the WWTP in the hazardous waste storage area prior to being recycled. During the visual inspection, I observed the universal waste lamps being stored in their original containers. All of the containers were closed, labeled and dated (see photo #5). Northrop generates approximately 90 pounds of universal waste lamps per month with 1080 pounds shipped off site in 2004.

Used Oil - Minimal used oil (D098) is generated at the facility from the maintenance of equipment such as hydraulic presses, compressors, drills, CNC tooling machines, etc... The maintenance department checks the oil in the equipment for cleanliness and viscosity and only replaces the oil if needed. Therefore, the generation rate for used oil has decreased drastically. Northrop currently generates less than one gallon of used oil per month, which is recycled by Safety-Kleen. I observed the used oil storage area and both tanks were properly labeled as "Used Oil."

4.4 Other Regulatory Requirements

Manifests - Ms. Gay provided me with the 2005 hazardous waste shipping manifests for review. I reviewed approximately 23 hazardous waste shipping manifests (February 2005 - November 2005). I noted deficiencies on all 23 manifests. No specific gravity was listed on any of the manifests destined for World Resources Company (9 total for 2005). No trailer license number was listed on any of the manifests destine for Safety-Kleen Systems (14 total for 2005). Example copies of the manifests that were deficient are included in attachment 10. These deficiencies were also noted on the 2003 and 2004 hazardous waste manifests. Ms. Gay stated that she would correct the oversite for future shipments.

NOV #4 - Failure to provide license plate numbers and specific gravity values on hazardous waste shipping manifests is in violation of 10 CSR 25-5.262(2)(B)1&2.

Storage Area - Northrop has two designated less than 90 day hazardous waste storage areas (see attachment 6 for their locations). During the visual inspection I observed both less than 90 day hazardous waste storage areas and noted no apparent violations. See photos #4 & #5 for a view of the hazardous waste storage area inside the WWTP and the sludge/PVC tote hazardous waste storage area outside.

I asked Ms. Gay if the hazardous waste storage areas were inspected. Ms. Gay stated that the hazardous waste storage areas were inspected at least weekly. Ms. Gay provided me with the 2005 inspection records for the hazardous waste storage areas (weekly environmental inspections) which included the universal wastes, recycled/reclaimed wastes, spill response equipment, POG containers, and AST's (used oil). See attachment 13 for examples of the weekly environmental inspections from 11/4/05 to 12/2/05. I also reviewed the 2003 and 2004 weekly environmental inspections and no apparent violations were noted.

Training - Ms. Gay provide me with a copy of Northrop's RCRA training program; RCRA training guides; and annual RCRA training rosters for review (see attachments 14, 15, & 16). The training program and training records appeared to be in compliance with the exception of written job descriptions. I asked Ms. Gay if Northrop had written job descriptions for personnel performing hazardous waste management which included written initial and continual training requirements. Ms. Gay stated that she thought Northrop had these documents in human resources but could not locate them. Upon further explanation of the requirements Ms. Gay determined that Northrop did not have written job descriptions outlining duties and initial and continual training requires for personnel performing hazardous waste operations. I asked Ms. Gay how many of the personnel listed on the training rosters actually perform RCRA hazardous waste operations. Ms. Gay stated that approximately fifteen people would require the job descriptions and stated that she would create a list of employees who actually perform hazardous waste operations and are subject to annual RCRA training requirements. I reminded Ms. Gay that emergency coordinators must also have written job descriptions.

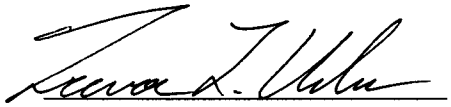
NOV #5 - Failure to have written job descriptions for approximately fifteen employees who perform hazardous waste operations which describes their specific hazardous waste duties and includes initial and continual training requirements is in violation of 10 CSR 25-5.262(1) per 40 CFR 265.16(d)(1), (2), & (3).

Contingency Plan - Ms. Gay provided me a copy of Northrop's Contingency Plan for review (see attachment 17). I reviewed the contingency plan and noted no apparent violations.

4.5 Other RCRA Issues

No additional specific information was requested during the exit briefing. See attachment 18 for the entry/exit briefing checklist.

I reviewed all other applicable Missouri Department of Natural Resources (MDNR) LQG, used oil and universal waste requirements, and no other apparent violations were noted. See attachment 19 for the MDNR LQG hazardous waste and used oil inspection checklists.



Trevor L. Urban
Environmental Scientist
Date: 01/04/2006

Attachments

1. Multi-Media Screening Checklist (2 pages)
2. Confidentiality Notice (1 page)
3. Receipt for Documents and Samples (1 page)
4. Notice of Violation (1 page)
5. Digital Image Chain of Custody, Photo Log and Photos #1- #6 (5 pages)
6. Facility Layout (3 pages)
7. Biennial Report for 2003 (7 pages)
8. Hazardous Waste Manifest Log for 2005 (1 page)
9. Waste Minimization Report for 2004 (1 page)
10. Hazardous Waste Manifest #s 1008, 1009, 1010, 1011, and 1012 for 2005 (6 pages)
11. MSDS for Envirostrip 785 (6 pages)
12. Spent Ammonium Chloride Etchant with Hydroxide Exemption Documentation (6 pages)
13. Hazardous Waste Weekly Environmental Inspections from 11/4/05 - 12/2/05 (5 pages)
14. RCRA Training Program (14 pages)
15. RCRA Training Guides (3 pages)
16. Annual RCRA Training Rosters for 2005 (6 pages)
17. Contingency Plan (14 pages)
18. Entry/Exit Briefing Checklist (1 page)
19. MDNR Hazardous Waste LQG and Used Oil Inspection Checklists (6 pages)

Forward To: EJ ☐ EPCRA / RMP / TSCA ☐ CWA ☐ Wetlands ☐ UIC ☐ PWS ☐ CAA / CFC ☐ RCRA ☐ UST ☐ SPCC ☐

REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Name: Northrop Grumman Interconnect Technology
Facility Ownership: Same as Above
Street: 4811 West Kearney
City: Springfield State: MO Zip: 65803
Phone: (417) 829-5350 Facility Contact: Jami Gay
Number of Employees: 330 Work Hours/Shifts 2/8-hour Shifts 5 days/week Facility Subject to OSHA regulations Yes ☒ No ☐

Inspector Trevor Urban
Primary Media: RCRA
Inspector Phone Ext.: 7133
Date: 12/06-07/05
SIC/NAICS Code 334418

Main facility activity, major process chemical(s) & description: Printing / Manufacturing of Circuit Board to include Nickel, Tin, Lead Copper + Gold Plating

(**Check all that apply**): painting/coating (water-based ☐, solvent-based ☐), printing ☐, reacting ☐, formulating ☐, distilling ☐, water treatment ☒, refrigeration ☐, manufacturing ☐, parts washers/degreasing (water-based ☐, halogenated-based ☐, non-halogenated-based ☐), combustion (boiler, furnaces, oxidizers) ☒ plating (chrome ☐, other See Above).

ENVIRONMENTAL JUSTICE (Note: Forward to EJ if a concern is identified during your inspection)

1. Is the facility located in an apparent low income area (e.g., with many abandoned and dilapidated properties)? No ☑ (stop) Yes ☐
   If yes, is facility less then 1000 feet from nearest routinely occupied property (house, school, etc.)? No ☐ (stop) Yes ☐ ***Forward to EJ***

EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SUBSTANCE CONTROL ACT (TSCA)

1. Did facility file a Tier II report with fire department, Local & State Emergency Planning Committee? Yes ☒ No ☐ ***Forward to EPCRA***
2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a chemical or >100 lbs of a Persistent Bioaccumulative Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years? No ☐ (stop) Yes ☒ ***Forward to EPCRA***
3. Has the facility: ***If any box in question 3 is marked - Forward to EPCRA***
   a. Stored ≥500 lbs of ammonia ☒, ≥100 lbs of chlorine ☐, or ≥10,000 lbs of an industrial chemical ☒, at any time over the last 2 years? ☒
   b. Stored ≥10,000 lbs of pressurized flammable material (propane, methane, butane, pentane, etc.) at any time over the last 2 years? ☒
   c. Used ≥10,000 lbs of ammonia ☒, chlorine ☐, halogenated solvents ☐, solvent-based paints ☐, or solvents ☐, or nitrated compound, over the last calendar year? ☒
   d. Generated ≥ one half pound of metal dusts, fumes, or metal turnings, over the last calendar year? ☒
4. Does the facility have any oil filled electrical equipment No ☐ (stop) Yes ☒ ***Forward to TSCA and ask*** Has facility tested oil filled equipment to determine PCB content; No ☐ Yes ☒ number containing PCBs greater than 50 ppm _____ and percent of all equipment tested ~200 Is equipment leaking (including wet or weeping equipment)? No ☒ Yes ☐ – ***Get Photo***

CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any wastewater to storm sewers, surface water, or the land? No ☒ (stop) Yes ☐
   If yes, are all wastewater discharges permitted? Yes ☐ No ☐ ***Forward to CWA***
2. Does the facility have process wastewaters that are discharged to a city POTW (Publicly Owned Treatment Works)? No ☐ (stop) Yes ☒
   If yes, are the discharges permitted by: State? ☐, City? ☒ – If yes, Stop here. No ☐ ***Forward to CWA***
   If yes, does the city have a state or EPA approved pretreatment program? Yes ☒ No or Don't Know ☐ ***Forward to CWA***
3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >1 acre, to storm sewers or surface water? No ☒ (stop) Yes ☐
   If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☐ No ☐ ***Forward to CWA***
4. Did you see any wastewater discharges not identified by the facility? No ☒ (stop) Yes ☐ - Identify location, time, appearance of discharge: _____ (***Get Photo***) ***Forward to CWA***
5. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☒ (stop) Yes ☐
   If yes, have any wetland areas been dredged, filled, channelized, dammed, or had gravel removed from them within the last 5 years? No ☐ (stop) Yes ☐ - Identify location and timeframe _____ (***Get Photo***) ***FWD to Wetlands***

SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)

1. Does facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspools, etc.)? No ☒ (stop) Yes ☐ ***Forward to UIC***
   If yes, do these liquid wastes consist of sanitary wastewater only? Yes ☐ No ☐
2. Does facility provide drinking water to 25 people or more from its own source (private well, pond, etc)? No ☒ (stop) Yes ☐ ***Forward to PWS***
   If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☐

CLEAN AIR ACT (CAA) and CFCs

1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No ☒ Yes ☐ ***Forward to CAA***
   Source _____ ***(Get Photo)***
2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No ☐ (stop) Yes ☒
   If yes, is equipment permitted? Yes ☒ No ☐ ***Forward to CAA*** *Describe:* _____
   _____
3. Does the facility have any cooling units that contain >50 lbs of refrigerant? No ☐ (stop) Yes ☒ ***Forward to CFC***
   If yes, are these units: Self-serviced? ☒ Contract Serviced? ☐ - Service Company: _____
4. Does the facility have a refrigeration process that contains more than 10,000 lbs of ammonia ? No ☒ (stop) Yes ☐ ***Forward to EPCRA/RMP***
5. Does the facility service motor vehicle air conditioning systems? No ☒ (stop) Yes ☐ ***Forward to CFC***

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)

1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No ☐ (stop) Yes ☒
   If yes, does facility have an EPA Hazardous Waste Identification Number? Yes ☒ (stop) No ☐ ***Forward to RCRA***
2. Is hazardous waste treated ☐ , stored >90-days ☐, burned ☐ , land filled ☐ , put in surface impoundments ☐ or waste piles ☐ ?
   No ☒ (stop) Yes ☐ If yes, is the facility permitted for above described activity? Yes ☐ No ☐ ***Forward to RCRA***
3. Did you see or does the facility have any large quantities of materials **that the facility claims to be non-hazardous waste material** (>10 drums, roll-offs, waste piles, etc. – exclude clean office trash, cardboard, & packaging type wastes)? No ☐ (stop) Yes ☒

Material Claimed To Be Non-Hazardous	**How does the facility know these wastes are non-hazardous?**
Circuit Boards	Testing, industry or manuf. info.., MSDS, etc. ☒; None available ☐ ***Forward to RCRA***
_____	Testing, industry or manuf. info.., MSDS, etc. ☐; None available ☐ ***Forward to RCRA***
_____	Testing, industry or manuf. info.., MSDS, etc. ☐; None available ☐ ***Forward to RCRA***
_____	Testing, industry or manuf. info.., MSDS, etc. ☐; None available ☐ ***Forward to RCRA***
_____	Testing, industry or manuf. info.., MSDS, etc. ☐; None available ☐ ***Forward to RCRA***

4. Did you see any leaking hazardous waste containers, drums, or tanks? No ☒ Yes ☐ ***Forward to RCRA***
   Describe: _____ ***(Get Photo)***
5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No ☒ Yes ☐ ***Forward to RCRA***
   Describe: _____ ***(Get Photo)***
6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No ☒ Yes ☐ ***Forward to RCRA & EPCRA*** Describe: _____ ***(Get Photo)***
7. Does the facility have any past or present underground petroleum product or hazardous material tanks? No ☒ Yes ☐ ***Forward to UST***
8. Does the facility have any underground fuel tanks for emergency generators? No ☒ Yes ☐ ***Forward to UST***

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

1. Does the facility have any aboveground oil tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume >1,320 gallons?
   No ☒ (stop) Yes ☐ - Does the facility have a certified SPCC Plan? Yes ☒ No ☐ ***Forward to SPCC***
   If yes, are there secondary containment systems for the tanks? Yes ☒ No ☐ ***Forward to SPCC***
   If yes, are any tanks leaking where oil could reach waters of the State or U.S.? No ☒ Yes ☐ ***(Get Photo) Forward to SPCC***

ENVIRONMENTAL MANAGEMENT SYSTEMS (EMS)

1. Does your facility have an EMS? No ☐ Yes ☒
2. Is the facility's EMS ISO 14001 certified? No ☒ Yes ☐

**** PLEASE TAKE PHOTOS TO DOCUMENT POTENTIAL PROBLEMS***

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name	
Northrup Grumman Interconnect Technology	
Facility Address	
4811 West Kearney Springfield, MO. 65803	
Inspector (print)	
Trevor Urban	
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101	Date 12/07/05

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. No statute specifically requires disclosure of the information.

3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and DO NOT want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print)	Signature/Date
JAMI GAY	12-7-05

I have received this Notice and DO want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested;

(Rev: 11/15/99)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name
Northrup Grumman Interconnect Technology
Facility Address
4811 West Kearney Springfield, MO. 65803

Documents Collected? YES X (list below) NO___

Samples Collected? YES___ (list below) NO X Split Samples: YES___ NO N/A

Documents/Samples were: 1) Received no charge X 2) Borrowed___ 3) Purchased___

Amount Paid: $ N/A Method: Cash___ Voucher___ To Be Billed___

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

==========

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

1) Facility Layout – (3 pages)
2) 2005 Hazardous Waste Manifest Log – (1 page)
3) Training Guide + Training Plan – (17 pages)
4) 2005 Training Rosters – (6 pages)
5) Weekly Environmental Inspection Logs – (5 pages)
6) Hazardous Waste Management Program Contingency Plan – (14 pages)
7) Hazardous Waste Manifests #1008 - 1013 → 6 pages
8) MSDS for Envirostrip 785 – (6 pages)
9) FY 2004 Waste Minimization Report – (1 page)
10) Biennial Report for 2003 – (7 pages)

Facility Representative (print)	Signature/Date
JAMI GAY	12-7-05
Inspector (print)	**Signature/Date**
Trevor Urban	12/7/05
U.S. EPA, Region VII, 901 N. 5th Street, Kansas City, KS 66101	

(rev:1/20/93)

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: Northrup Grumman Interconnect Technology
Address: 4811 West Kearney
Springfield, MO 65803
EPA ID Number: MOD007152903 Date: 12/07/2005

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

Citation	Description of Violation
1) 10 CSR 25-5.262(1) Per 40 CFR 265.173(a)	T.U. – Failure to Keep Satellite accumulation Containers Closed
2) 10 CSR 25-5.262(1) Per 40 CFR 262.34	(c)(1)(ii) – Failure to Mark/identify contents of Satellite Accum. Containers and put start date on container – (PISM + Environmental Lab)
3) 10 CSR 25-5.262(1) Per 40 CFR 262.34	(c)(1) + (2) – Failure to move satellite container to storage + Place Satellite container at/near point of generation. (ie waste Paint)
4) 10 CSR 25-5.262(2)(B) 1+2	– Failure to Provide license Plate #s + Specific gravity on manifests.
5) 10 CSR 25-5.262(1) Per 40 CFR 265.16(d)(1), (2), + (3)	– Failure to have written job descriptions for employees performing Hazardous waste management to include duties performed + intial + Continual Training.

You are requested to submit a written response within **14 calendar days** of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII
901 North 5th Street
Kansas City, Kansas 66101

ATTN. Trevor Urban

If you have any questions about this Notice or wish to discuss your response, you may call me at (913)-551-7133, or Beth Koesterer (Compliance Officer) at (913)-551-7673.

This Notice prepared by Trevor Urban Date: 12/07/2005

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: JAMI GAY Date: 12-7-05
Signature:
Title: ENVIRONMENTAL ENGINEER

ATTACHMENT 4

PHOTO LOG

Facility Name / City: Northrop Grumman Interconnect Technologies
Springfield, Missouri 65803
Facility ID #: MOD007152903
Date : December 6, 2005
Photographer: Trevor Urban
Type of Camera: Canon Power Shot G5, Serial #: 6721003894
Digital Recording Media: Flashcard
All digital photos were copied by: Trevor Urban on December 9, 2005.
All digital photos were copied to: CD-R
Original copy is stored in: CD-R. Digital photos were downloaded to CD-R all by Trevor Urban. No changes were made in the original image files prior to storage on the CD-R.

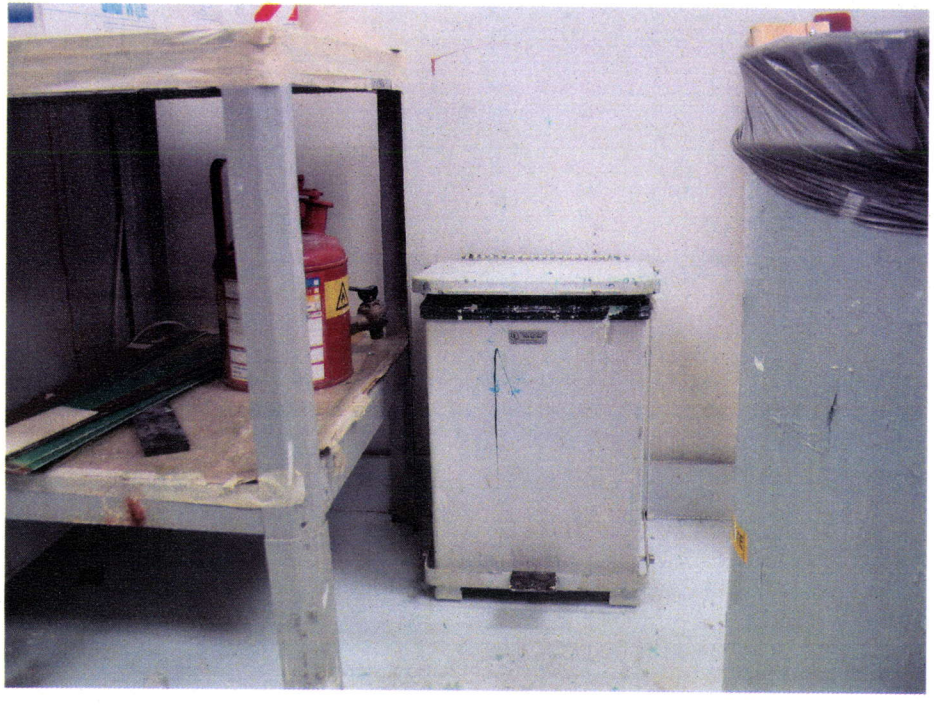
Report Photo #	Photographer	Date	Approx. Time	File Name (IMG_xxx.jpg)	Description
1	Trevor Urban	12/06/05	AM	001	Photo of a satellite accumulation container located in the PISM area full of acetone contaminate rag waste. The lid on the container appeared to be sprung and was not closed. The container was not labeled or dated with an accumulation start date. Photo taken facing east.
2	Trevor Urban	12/06/05	PM	002	Photo of a one cubic yard PVC tote under the acid disposal (north) WWTP sludge press. The container is approximately 80% full, labeled and dated. Also shown in the photo is a 55-gallon container of hazardous paint waste, closed labeled and dated. Photo taken facing east.
3	Trevor Urban	12/06/05	PM	003	Same as Photo #2. Closeup photo of the 55-gallon container of hazardous paint waste, closed labeled and dated. The container is located in the WWTP sludge press room. Photo taken facing north.
4	Trevor Urban	12/06/05	PM	004	Photo of the hazardous waste storage area located inside the WWTP in the room directly west of the sludge press area. Four 55-gallon containers of hazardous waste are shown as well as universal waste lamps and batteries. All containers were closed, labeled and dated. Photo taken facing north.
5	Trevor Urban	12/06/05	PM	005	Photo of the one cubic yard PVC tote hazardous waste storage area located outside, approximately 200 feet north of the WWTP. There are twenty-one PVC totes in storage which contained F006/D008 hazardous waste and all were closed, labeled and dated. Photo taken facing northwest.
6	Trevor Urban	12/06/05	PM	006	Photo of a 5-gallon plastic satellite accumulation container located in the environmental laboratory in the WWTP. The container was approximately half full and was not labeled as to it contents, nor did it have an accumulation start date. Photo taken facing west.

Northrop Grumman Interconnect technologies Photos Located in Springfield, Missouri

Photos taken by Trevor Urban

on December 6, 2005

ATTACHMENT 5 Page 3 of 5



Northrop Grumman - Springfield, Missouri - 12/06/2005
Photo Number 001 Trevor Urban T.U.
Description: Photo of a satellite accumulation container located in the PISM area full of acetone contaminate rag waste. The lid on the container appeared to be sprung and was not closed. The container was not labeled or dated with an accumulation start date. Photo taken facing east.

Northrop Grumman - Springfield, Missouri - 12/06/2005
Photo Number 002 Trevor Urban T.U.
Description: Photo of a one cubic yard PVC tote under the acid disposal (north) WWTP sludge press. The container is approximately 80% full, labeled and dated. Also shown in the photo is a 55-gallon container of hazardous paint waste, closed labeled and dated. Photo taken facing east.

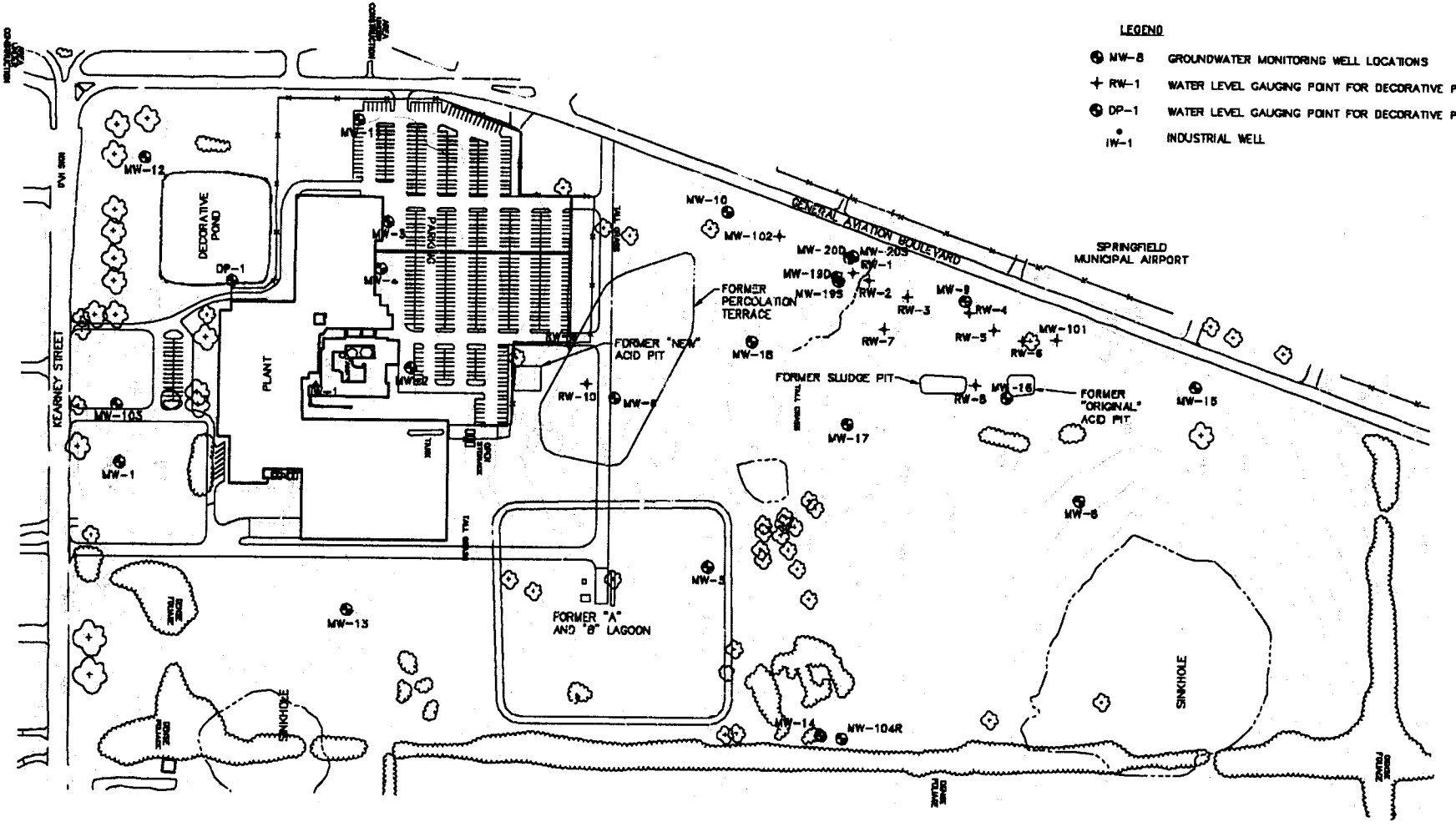
Northrop Grumman - Springfield, Missouri - 12/06/2005
Photo Number 003 Trevor Urban TU
Description: Same as Photo #2. Closeup photo of the 55-gallon container of hazardous paint waste, closed labeled and dated. The container is located in the WWTP sludge press room. Photo taken facing north.

Northrop Grumman - Springfield, Missouri - 12/06/2005
Photo Number 004 Trevor Urban T.U.
Description: Photo of the hazardous waste storage area located inside the WWTP in the room directly west of the sludge press area. Four 55-gallon containers of hazardous waste are shown as well as universal waste lamps and batteries. All containers were closed, labeled and dated. Photo taken facing north.

ATTACHMENT 5 Page 5 of 5

Northrop Grumman - Springfield, Missouri - 12/06/2005
Photo Number 005 Trevor Urban TU
Description: Photo of the one cubic yard PVC tote hazardous waste storage area located outside, approximately 200 feet north of the WWTP. There are twenty-one PVC totes in storage which contained F006/D008 hazardous waste and all were closed, labeled and dated. Photo taken facing northwest.

Northrop Grumman - Springfield, Missouri - 12/06/2005
Photo Number 006 Trevor Urban TU
Description: Photo of a 5-gallon plastic satellite accumulation container located in the environmental laboratory in the WWTP. The container was approximately half full and was not labeled as to it contents, nor did it have an accumulation start date. Photo taken facing west.



NOTES:

AREA FLOWN BY WESTERN AIR MAPS LENEXA, KS.
MAY 15, 1995.

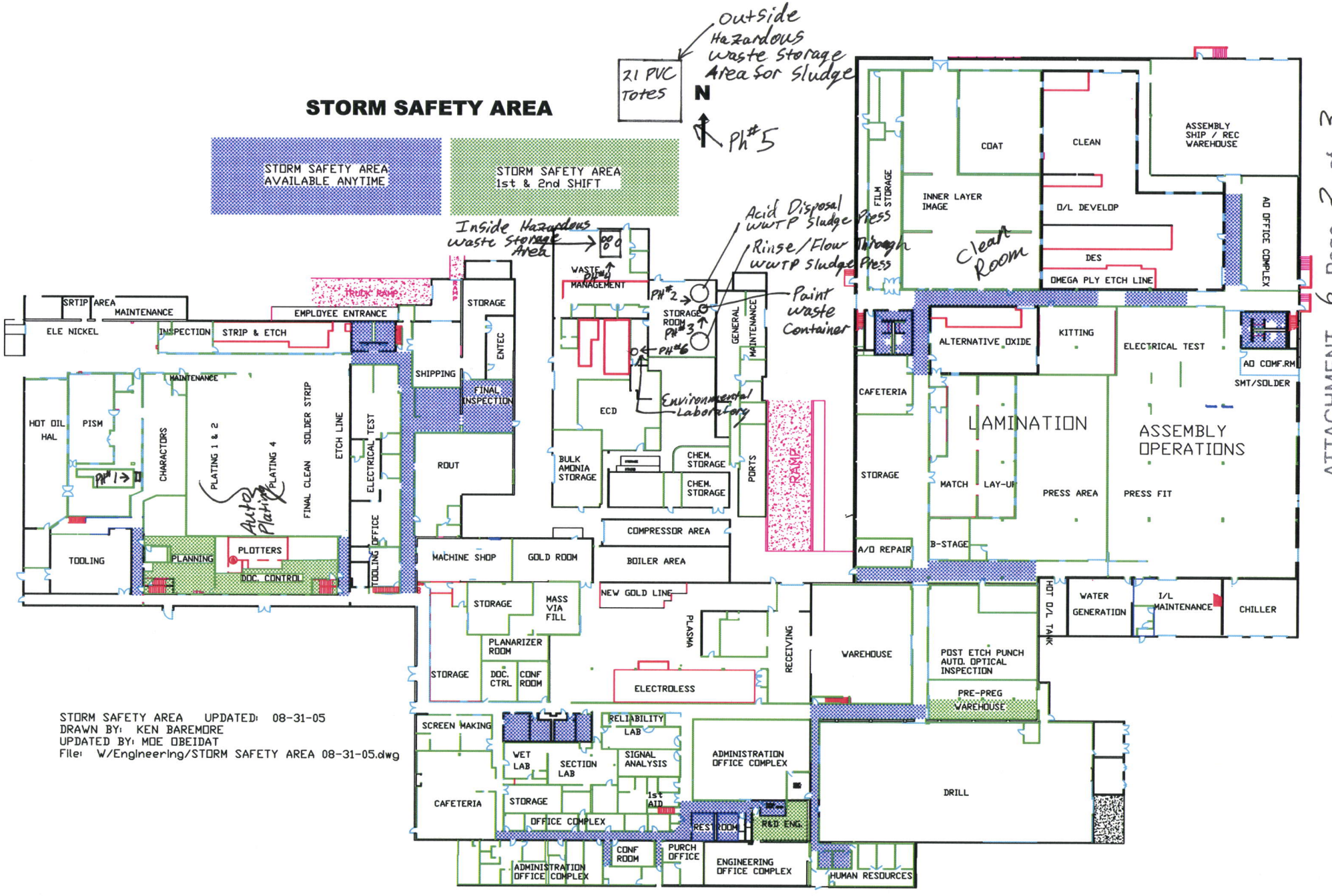
DESIGNED BY:	MGD
DRAWN BY:	GLH
APPROVED BY:	MGD
DATE:	3-31-03

SECOR

SITE MAP
INTERCONNECT TECHNOLOGIES DIVISION
LITTON SYSTEMS, INC.
4911 WEST KEARNEY
SPRINGFIELD, MO 65803

JOB NO. 61OT.02003 FIGURE 2

ATTACHMENT 6 Page 1 of 3



STORM SAFETY AREA UPDATED: 08-31-05
DRAWN BY: KEN BAREMORE
UPDATED BY: MOE OBEIDAT
File: W/Engineering/STORM SAFETY AREA 08-31-05.dwg

ATTACHMENT 6 Page 3 of 3

MAIL THE COMPLETED FORM TO: The appropriate EPA Regional or State Office.	United States Environmental Protection Agency **RCRA SUBTITLE C SITE IDENTIFICATION FORM**
1. Reason for Submittal (see instructions on page 10) CHECK CORRECT BOXES	**A. Reason for Submittal:** ☐ To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste or used oil activities). ☐ To provide subsequent notification (to update site identification information). ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application. ☐ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment #) ☒ As a component of Hazardous Waste Report.
2. Site EPA ID Number (see instructions on page 11)	**EPA ID Number:** MOD007152903
3. SiteName (see instructions on page 11)	**Site Name:** Northrup Grumman--Interconnect Technolog
4. Site Location Information (see instructions on page 11)	**Street Address:** 4811 w. kearney **City, Town or Village:** springfield — **State:** MO **County Name:** GREENE — **Zip Code:** 65803
5. Site Land Type (see instructions on page 11)	**Site Land Type:** ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other
6. North American Industry Classification System (NAICS) Code(s) for the Site (see instructions on page 11)	**A.** 334418 — **B.** **C.** — **D.**
7. Site Mailing Address (see instructions on page 12)	**Street or P.O. Box:** PO Box 2847 **City, Town or Village:** Springfield **State:** MO **Country:** UNITED STATES — **Zip Code:** 65801
8. Site Contact Person (see instructions on page 12)	**First Name:** jami **MI:** — **Last Name:** gay **Phone Number:** 4178295350 — **Phone Number Extension:** na
9. Legal Owner and Operator of the Site (see instructions on page 12 and 13)	**Name of Site's Legal Owner:** Northrup Grumman Corp. — **Date Became Owner (mm/dd/yyyy):** 04/01/2001 **Owner Type:** ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other **Name of Site's Operator:** Interconnect Tech Div.--Litton — **Date Became Operator (mm/dd/yyyy):** 04/01/2001 **Operator Type:** ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

ATTACHMENT 7 Page 1 of 7

EPA ID No. MOD007152903

10. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. See instructions on pages 13, 14, 15 and 16)

A. Hazardous Waste Activities

1. Generator of Hazardous Waste
(choose one of the following three categories)

- [X] a. LQG: Greater than 1000 kg/mo (2,200 lbs.) of non-acute hazardous waste; or
- [ ] b. SQG: 100 to 1000 kg/mo (220 - 2,200 lbs.) of non-acute hazardous waste; or
- [ ] c. CESQG: Less than 100 kg/mo of non-acute hazardous waste

In addition, indicate other generator activities (check all that apply)

- [ ] d. United States Importer of Hazardous Waste
- [ ] e. Mixed Waste (hazardous and radioactive) Generator

For items 2 through 6, check all that apply:

- [ ] **2. Transporter of Hazardous Waste**
- [ ] **3. Treater, Storer or Disposer of Hazardous Waste (at your site)** Note: A hazardous waste permit is required for this activity.
- [ ] **4. Recycler of Hazardous Waste (at your site)** Note: A hazardous waste permit may be required for this activity.
- **5. Exempt Boiler and/or Industrial Furnace**
  - [ ] a. Small Quantity On-Site Burner Exemption
  - [ ] b. Smelting, Melting, Refining Furnace Exemption
- [ ] **6. Underground Injection Control**

B. Universal Waste Activities

1. Large Quantity Handler of Universal Waste (refer to your State regulations to determine what is regulated). Indicate types of universal waste generated and/or accumulated at your site. (check all boxes that apply):

	Generated	Accumulated
a. Batteries	[ ]	[ ]
b. Pesticides	[ ]	[ ]
c. Thermostats	[ ]	[ ]
d. Lamps	[ ]	[ ]
e. Other (specify)	[ ]	[ ]
f. Other (specify)	[ ]	[ ]
g. Other (specify)	[ ]	[ ]

- [ ] **2. Destination Facility for Universal Waste**
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

1. Used Oil Transporter - Indicate type(s) of activity(ies)
- [ ] a. Transporter
- [ ] b. Transfer Facility

2. Used Oil Processor and/or Re-refiner - Indicate Type(s) of Activity(ies)
- [ ] a. Processor
- [ ] b. Re-refiner

- [ ] **3. Off-Specification Used Oil Burner**

4. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)
- [ ] a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- [ ] b. Marketer Who First Claims the Used Oil Meets the Specifications

11. Description of Hazardous Wastes (see instructions on page 16)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D002	D008	F003	F006		

B. **Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes.** Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if needed for more waste codes.

12. **Comments (see instructions on page 17)**

13. **Certification.** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons direcly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. **(see instructions on page 17)**

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
William E. Moore	Bill Moore, General Manager of North American Operations	02/11/2004

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Northrup Grumman--Interconnect

EPA ID NO: MOD007152903

FORM GM

U.S. ENVIRONMENTAL PROTECTION AGENCY

2002 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1

A. Waste Description (page 22): WASTE CORROSIVE SOLID, ACIDIC, INORGANIC, NOS, (SULFURIC ACID SOLID CONTAMINATED DEBRIS), 8, UN3260, PG II

B. EPA Hazardous Waste Codes (page 22): D002 D008 NA NA NA

C. State Hazardous Waste Codes (page 22):

D. Source Code (page 23): G03

Management Method Code for Source Code G25

E. Form Code (page 23):

F. RCRA Radioactive Mixed (page 23): ☐ Yes

G. Quantity Generated in 2002 (page 22): 250.000000

H. UOM (page 23): 1

Density: 1.00

☐ lbs/gal ☒ sg

Sec. 2

Was any of this waste managed on-site? (page 24)

☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)

☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2002 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2002 (page 25)

Sec. 3

A. Was any of this waste shipped off-site in 2002 for treatment, disposal or recycling? (pages 25 and 26)

☒ Yes (CONTINUE TO BOX B) ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2002 (page 26)
Site 1	TXD077603371	H061	250.000000
Site 2			
Site 3			

Comments:

[-WM]

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Northrup Grumman--Interconnect

EPA ID NO: MOD007152903

FORM GM

U.S. ENVIRONMENTAL PROTECTION AGENCY

2002 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1

A. Waste Description (page 22): RQ, HAZARDOUS WASTE, SOLID, NOS, (F006) 9, NA 3077, PG III

B. EPA Hazardous Waste Codes (page 22): F006 NA NA NA NA

C. State Hazardous Waste Codes (page 22):

D. Source Code (page 23): G23

Management Method Code for Source Code G25:

E. Form Code (page 23): W519

F. RCRA Radioactive Mixed (page 23): ☐ Yes

G. Quantity Generated in 2002 (page 22): 271.000000

H. UOM (page 23): 7

Density: 0.82

☐ lbs/gal ☒ sg

Sec. 2

Was any of this waste managed on-site? (page 24)

☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)

☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2002 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2002 (page 25)

Sec. 3

A. Was any of this waste shipped off-site in 2002 for treatment, disposal or recycling? (pages 25 and 26)

☒ Yes (CONTINUE TO BOX B) ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2002 (page 26)
Site 1	AZD980735500	H010	271.000000
Site 2			
Site 3			

Comments:

[+WM]

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Northrup Grumman--Interconnect

EPA ID NO: MOD007152903

FORM GM

U.S. ENVIRONMENTAL PROTECTION AGENCY

2002 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1

A. Waste Description (page 22): WASTE SOLIDS CONTAINING FLAMMABLE LIQUIDS, NOS, (CONTAINS ACETONE, ISOPROPANOL) 4.1, UN 3175, PG II, DOT ERG # 133

B. EPA Hazardous Waste Codes (page 22): D001 F003 NA NA NA

C. State Hazardous Waste Codes (page 22):

D. Source Code (page 23): G09

Management Method Code for Source Code G25:

E. Form Code (page 23): W002

F. RCRA Radioactive Mixed (page 23): ☐ Yes

G. Quantity Generated in 2002 (page 22): 1,760.000000

H. UOM (page 23): 1

Density: 1.01

☐ lbs/gal ☒ sg

Sec. 2

Was any of this waste managed on-site? (page 24)

☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)

☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2002 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2002 (page 25)

Sec. 3

A. Was any of this waste shipped off-site in 2002 for treatment, disposal or recycling? (pages 25 and 26)

☒ Yes (CONTINUE TO BOX B) ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2002 (page 26)
Site 1	IND000780403	H141	250.000000
Site 2	TXD077603371	H061	1,510.000000
Site 3			

Comments: G09----PARTS ARE WIPED W/RAGS THAT CONTAIN A FLAMMABLE LIQUID [+WM]

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Northrup Grumman--Interconnect

EPA ID NO: MOD007152903

FORM GM

U.S. ENVIRONMENTAL PROTECTION AGENCY

2002 Hazardous Waste Report

WASTE GENERATION AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form. In addition, the page number of instructions specific to each box is provided in parentheses.

Sec. 1

A. Waste Description (page 22): RQ, HAZARDOUS WASTE, SOLID, NOS, 9, NA 3077, (CONTAINS LEAD), PG III, D008-1%, (EPA TOXIC), ERG #171

B. EPA Hazardous Waste Codes (page 22): D008 NA / NA NA NA

C. State Hazardous Waste Codes (page 22):

D. Source Code (page 23): G09

Management Method Code for Source Code G25:

E. Form Code (page 23): W002

F. RCRA Radioactive Mixed (page 23): ☐ Yes

G. Quantity Generated in 2002 (page 22): 675.000000

H. UOM (page 23): 1 — Density: 0.42 — ☐ lbs/gal ☒ sg

Sec. 2

Was any of this waste managed on-site? (page 24)

☐ Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)

☒ No (SKIP TO SEC. 3)

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2002 (page 25)	On-site Management Method Code (page 24)	Quantity treated, disposed or recycled on-site in 2002 (page 25)

Sec. 3

A. Was any of this waste shipped off-site in 2002 for treatment, disposal or recycling? (pages 25 and 26)

☒ Yes (CONTINUE TO BOX B) ☐ No (FORM IS COMPLETE)

	B. EPA ID No. of facility to which waste was shipped (page 26)	C. Off-site Management Method Code Shipped to (page 26)	D. Total quantity shipped in 2002 (page 26)
Site 1	TXD005514138	H061	100.000000
Site 2	TXD077603371	H061	575.000000
Site 3			

Comments: G09--MISCELLANEOUS LEAD-CONTAMINATED DEBRIS FROM PRODUCTION AREAS INVOLVING LEAD. THESE ARE VACCUUM BAGS, FILTERS, GLOVES, RAGS, ETC. [+WM]

2005 HAZ WASTE MANIFEST RETURN LOG

Date shipped	Manifest #	TSDF/Wastestream(s)	Copy Returned? X=yes
2-11-05	991	WRC	✓
2-14-05	992	SKleen - KY	✓
2-14-05	993	SKleen - TX	✓
3-10-05	994	WRC	✓
[illegible]	995	WRC	✓
4-8-05	996	SKleen Pb debris, Flam rags	✓
4-8-05	997	SKleen Batteries, Prism	✓
4-8-05	998	S. Kleen fluor. lamps	✓
4-11-05	999	SKleen	✓
5-5-05	1000	WRC	✓
6-2-05	1001	WRC	✓
7-8-05	1002	SKleen Pb debris, Flam rags	✓
7-8-05	1003	SKleen Fl. lights Prism ink	✓
7-11-05	1004	WRC	✓
7-21-05	1005	SKleen asphalt sealer aerosol resin	✓
9-9-05	1006	WRC - Sludge	✓
9-9-05	1007	SKleen	✓
10-13-05	1008	WRC Sludge	✓
11-4-05	1009	SKleen	✓
11-4-05	1010	SKleen	✓
11-4-05	1011	SKleen	✓
11/8/05	1012	WRC - Sludge & Rotor Dust	✓
~~11/9/05~~			
11/23/05	1013	SK / WTI - CN soln.	

ATTACHMENT 8 Page 1 of 1

Wastes Minimization – RY 2004

(PCBO & AO are now combined)

Waste Stream	TSDF	Waste Qty	UOM	Disposal Method	Lbs. Recovered	UOM TONS GENERATED	Component(s) Recovered	$ Out	$ In	
Scrap Cu/Tin Boards/Frames/Silver film	WRC (CBS)	190,680	lbs.	Recycling	Ag--2623 lbs, Cu--5352 lbs. (Cu ITAR, IBM, Lucent, IBM Plastic)	95.34	Cu, Zn, Ni, Sn, Fe, Pb, Cr, Cd	$14,785.23	$5,756.14	.05/lb., Ag film--.08/lb, Au pins 1.60/lb, Au connectors
WT Sludge	WRC (WWT S;idge)	1,278,000	lbs.	Smelted/reclaimed	1,278,000	639.00	Cu, Zn, Ni, Sn, Fe, Pb, Cr, Cd	$150,165.00	----	
Lead dross & Lead paste	ERC	12,966	lbs.	Recycling	12,966	6.48	lead	—	$8,805.06	
Used Oil	Safety Kleen - oil	3,545	lbs.	Recycling	3,545	1.77	oil	$607.15	---	
Pb Debris	Safety Kleen - Pb cont debris	3,350	lbs.	Incineration	0	1.68	---	$1,340.00	---	*$180/dm*
Flammable Rags	Safety Kleen - flam rags	4,350	lbs.	Fuels Blended	0	2.18	---	$1,864.00	---	*$150/dm*
Spent Ammonia Etchant	MicroNutrients	1,100,948	lbs.	Reuse	1,100,948	550.47	*Spent Etchant:17.5% AmCl, 30% AmOH-Cu reclaimed, ultrapurified.*	---	---	
Router Dust	WRC (router dust)	11,585	lbs.	Smelted/reclaimed	11,585	5.79	Cu, trace metals	$1,361.00	---	
Trash	American Disposal	1,018,500	lbs.	Landfill	0	509.25	0	$36,011.00	---	
Polonium 201	NRD	25	lbs. 5 Anti-Static units	HazWaste landfill for RAD / precious metals reclaimed	not available	0.04	radiocative elements, precious metals	---	---	
contaminated soil	Safety Kleen (contaminated soil)	33,185	lbs.	Subt. C Landfill	0	16.59	0	remediation Ph. II	---	
BioHazardous waste	SteriCycle	39.1	lbs.	Sterilize/Landfill	0	0.02	0	$128.70	---	
Batteries	Safety Kleen - batteries	50	lbs.	Recycle	unknown	0.03	metals	---	$761.00	
Mercury Articles	Safety Kleen - Hg containing	20	lbs.	Recycle	20	0.01	Hg	---	$739.00	
Flourescent Light Bulbs	Safety Kleen - Flour. Bulbs	1,080	lbs.	Recycle	1,080	0.54	elements	$25 for 4', $40 for 8'	$1,205.00	
PCBs	Safety Kleen - PCB capacitors	57.2	lbs.	reclaimed	unknown	0.03	PCB	---	$300.00	
Metals	Commercial Metals	44,001	lbs.	Recycle	44,001	22.00	Cu, Ag, Fe, Al, Ni	---	$7,127.15	
Drill bits	Carbide Recycle	26,385	1,319,225	bits repointed for reuse	26,385	13.19	metals	---	recycle $ below	
" "	Carbide Recycle	3,688	lbs.	Recycle	3688	1.84	metals	---	$8,531.75	
Fe rings from drill bits	Carbide Recycle	325	lbs.	Recycle	325	0.16	metals	---	recycle $ below	
Carbon	Safety Kleen	4,800	0	Reuse	4,800	2.40	--	---	---	
Cell phones	Call To Protect program	15	phones	Reuse	15	0.004	used by battered women	---	---	
Printer cartridges	Schools, Humane Society	626	cartridges	Reuse	626	0.05	raw materials	---	---	
Phone books	Girl Scouts	186	books	Recycle	186	0.03	Paper	---	---	
Used Christmas cards	St. Jude's Hospital	~30	lbs.	Reuse	~30	0.02	raw materials	---	---	
Summary Totals		3,737,579			[illegible]	[illegible]		[illegible]	[illegible]	

ATTACHMENT 9 Page 1 of 1

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
Hazardous Waste Program
P.O. Box 176 Jefferson City, Missouri 65102
573-751-3176

HAZARDOUS WASTE MANIFEST

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENT
INSTRUCTIONS FOR THE COMPLETION OF THIS FORM ARE ON A SEPARATE SH

EMERGENCY RESPONSE	U.S. COAST GUARD 1-800-424-8802	CHEM TREC 1-800-424-9300	DEPT. OF NATURAL RESOURCES 573-634-2436

Please print or type (Form designed for use on elite (12-pitch) typewriter.) Form Approved OMB No 2050-0

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. M O D 0 0 7 1 5 2 9 0 3 — Manifest Document No. 01008

2. Page 1 of 1 — Information in the shaded areas is required by State law.

3. Generator's Name and Mailing Address
Litton Interconnect Technologies - PCBO
4811 W. Kearney Street, Springfield, MO 65803-9579
4. Generator's Phone (417) 862-0751

A. Missouri Manifest Document Number 0 0 1 3 1 7 [redacted] 1 0 0

B. G.S.I. (Gen. Site Address) SAME

5. Transporter 1 Company Name: Philip Transportation & Remediation, Inc.
6. US EPA ID Number: C A D 0 6 3 5 4 7 9 9 0
C. MO. Trans. ID: H1748
D. Transporter's Phone: 800-321-1030

7. Transporter 2 Company Name
8. US EPA ID Number
E. MO. Trans. ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
World Resources Company
8113 W. Sherman St.
Tolleson, Arizona 85353-4025
10. US EPA ID Number: A Z D 9 8 0 7 3 5 5 0 0
G. State Facility's ID: RRAZ03
H. Facility's Phone: 800-972-1955

11. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group (if any))	12. Containers Number	Type	13. Total Quantity	14. Unit Wt/Vol.	I. Waste No.
a. RQ, Hazardous waste, solid, n.o.s., (F006), 9, NA3077, III	027	CF	00022	Y	EPA WASTE CODE F 0 0 6 / STATE N O N
b.					EPA WASTE CODE / STATE
c.					EPA WASTE CODE / STATE
					EPA WASTE CODE / STATE

J. Additional Descriptions for Materials Listed Above	K. HANDLING CODE (FACILITY USE ONLY) INTERIM	FINAL	COMMENTS
a. F006 wastewater sludge	T 1 8	T 1 8	recycling
b.			
c.			
d.			

15. Special Handling Instructions and Additional Information
State: CA
24 HOUR EMERGENCY RESPONSE: 1-800-424-9300 CHEMTREC Trailer License #: 41343
(USE CHEMTREC COMPANY CODE "WORR") WEAR GLOVES AND GOGGLES "Specific Gravity"

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and label and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and th have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a sr quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.

GENERATOR

Printed/Typed Name	Signature	Month	Day	Ye
JAMI GAM		10	13	0

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date: Month	Day	Y
Rick Ward	Rick Ward	10	13	0

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date: Month	Day	Y

FACILITY

19. Discrepancy Indication Space

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date: Month	Day
Armando Chavez	Armando Chavez	10	19

EPA FORM 8700-22 (REV. 1-99) MDNR-HWG 10 PREVIOUS EDITIONS ARE OBSOLETE

CONTAINS 50% RECYCLED PAPER W INCLUDES NOT LESS THAN 20% CONSUMER WASTE.

TEXAS NATURAL RESOURCE

TEXAS NATURAL RESOURCE
CONSERVATION COMMISSION
P.O. Box 13087
Austin, Texas 78711-3087

6-193-02

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. MOD007152903	Manifest Document No. 01009	2. Page 1 of 1	Information in the shaded area is not required by Federal law

3. Generator's Name and Mailing Address: LITTON INTERCONNECT TECH. PCBO, 4811 W KEARNEY ST, SPRINGFIELD MO 65803

4. Generator's Phone: 417 862-0751

A. State Manifest Document Number: S 00959619

B. State Generator's ID: D0029

5. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC

6. US EPA ID Number: MOD000669069

C. State Transporter's ID: 88888

D. Transporter's Phone: 417 869-1179

7. Transporter 2 Company Name: SAFETY-KLEEN SYSTEMS, INC (Smithsystems Transportation)

8. US EPA ID Number: NED986382133 TXR000050930

E. State Transporter's ID: 87109

F. Transporter's Phone: 800 669-5840

9. Designated Facility Name and Site Address: 000618 SAFETY-KLEEN SYSTEMS, INC. 1722 COOPER CREEK ROAD DENTON, TX 76208

10. US EPA ID Number: TXD077603371

G. State Facility ID: 65124

H. Facility's Phone: 940 483-5200 800 884-259

11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number and Packing Group)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
X	a. WASTE SOLIDS CONTAINING FLAMMABLE LIQUID, N.O.S. (ACETONE, ISOPROPANOL) 4.1 UN3175 PG II (ERG#133)	003	F	00325	P	OUTS409H
X	b. HAZARDOUS WASTE, SOLID, N.O.S. (LEAD) 9 NA3077 PG III (ERG#171)	002	F	00150	P	OUTS310H
X	c. BATTERIES, WET, FILLED WITH ALKALI 8 UN2795 PG III (ERG#154) (UNIVERSAL WASTE)	002	F	00120	P	UNIV309H
	d.					

J. Additional Descriptions for Materials Listed Above: IA) F003 D001 IB) D008 IC) NONE 3222

K. Handling Codes for Wastes Listed Above: A) H061 B) C) H141

15. Special Handling Instructions and Additional Information: 1083915 MFST R/T#106710188 0001-8708-01 EMERGENCY RESP 800-468-1760(24 HR). IF UNDELIVERABLE RETURN TO GENERATOR. SK CORP AUTH'D TO USE SUBSEQUENT CARRIERS: 40343,41038,81681,82739,86256 TRANS H-1273 MO-0013171009 SKDOT# A: 49375 B: 22330 C: 115942 D: 11-2008

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name and ar classified, packed, marked, and labelled/placarded, and are in all respects in proper condition for transport by highway according to applicable international and nationa government regulations, including applicable state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to b economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present an future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and sele the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name	Signature	Month	Day	Y
X John Goll	X	11	04	0

TRANSPORT

17. Transporter 1 Acknowledgement of Receipt of Materials				
Printed/Typed Name: Alan Farran	Signature	Month: 11	Day: 04	Date: 0
18. Transporter 2 Acknowledgement of Receipt of Materials				
Printed/Typed Name: Adam Kurkendall	Signature	Month: 11	Day: 11	Date: 0

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Month | Day | Date

BILL OF LADING/MANIFEST

1. Shipper's US EPA ID No. (If Applicable)	Document No.	2. Page 1 of 1
MOD007152903	010.1.0	

3. Shipper's Name and Mailing Address: LITTON INTERCONNECT TECH.
PCBO
4811 W KEARNEY ST
SPRINGFIELD MO 65803

01010
D0029

4. Shipper's Phone (417 862-0751

5. Transporter 1 Company Name	6. US EPA ID Number	A. Transporter's Phone
SAFETY-KLEEN SYSTEMS, INC	MOD000669069	417 869-1179 88888
7. Transporter 2 Company Name	8. US EPA ID Number	B. Transporter's Phone
~~SAFETY-KLEEN SYSTEMS, INC~~ SMITH SYSTEMS TRANSPORTATION	~~TXR000053852~~ NED986382133	~~800-669-5840~~ 800-884-2597 87109
9. Designated Facility Name and Site Address 000618 SAFETY-KLEEN SYSTEMS, INC. 1722 COOPER CREEK ROAD DENTON, TX 76208	10. US EPA ID Number TXD077603371	C. Facility's Phone 940 483-5200

	11. Shipping Name and Description	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vc
a.	NON REGULATED MATERIAL, LIQUID		001	DM	00150	P
b.						
c.						
d.						

15. Special Handling Instruction and Additional Information

IDP39151 MFST R/T#105369007 0001-8708-01
EMERGENCY RESP 800-468-1760(24 HR). IF UNDELIVERABLE RETURN TO GENERATOR.
SK CORP AUTH'D TO USE SUBSEQUENT CARRIERS: 81300,40355,41015,40582,84815
TRANS ~~H 1273~~ MO-001317-1010
A) OUTS2091
H-2068
SKDOT# A: 33262 B: C: D:
3222 OUTS2091 H061

16a. US DOT HAZARDOUS MATERIALS SHIPPER'S CERTIFICATION: "This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

USE 16A OR 16B

Printed/Typed Name | Signature required here if US DOT regulated | Month Day Year

16b. NON-REGULATED SHIPPER'S CERTIFICATION: I certify the materials described above on this form are not subject to federal regulations for Transportation or Disposal.

Printed/Typed Name: X JAM GAY | Sign here if material is not DOT regulated: X J.W. Gay | Month 1 1 Day 04 Year 0

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Alan Farran | Signature | Month 1 1 Day 04 Year 0

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name: Adam Kurkendall | Signature | Month 1 1 Day 1 Year 0

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of materials covered by this form except as noted in Item 19.

Printed/Typed Name: C CRAIG | Signature | Month 1 1 Day 14 Year 0

IN EVENT OF EMERGENCY CALL
1-800-468-1760 (24 hours)

ORIGINAL RETURN TO GENERATOR

FORM NO. 90291

BILL OF LADING/MANIFEST

1. Shipper's US EPA ID No. (If Applicable): MOD007152903
Document No.: 0.1.0.1.1
2. Page 1 of 1

01011
D029

3. Shipper's Name and Mailing Address: LITTON INTERCONNECT TECH.
PCBO
4811 W KEARNEY ST
SPRINGFIELD MO 65803

4. Shipper's Phone (417 862-0751

5. Transporter 1 Company Name: SAFETY-KLEEN SYSTEMS, INC
6. US EPA ID Number: MOD000669069
A. Transporter's Phone: 417 869-1179 88888

7. Transporter 2 Company Name: ~~SAFETY-KLEEN SYSTEMS, INC~~ Smith Systems Transportation
8. US EPA ID Number: ~~TXR000030930~~ NED986382133
B. Transporter's Phone: 800 ~~666-5840~~ 884-2597 8709

9. Designated Facility Name and Site Address: 000618
SAFETY-KLEEN SYSTEMS, INC.
1722 COOPER CREEK ROAD
DENTON, TX 76208
10. US EPA ID Number: TXD077603371
C. Facility's Phone: 940 483-5200

	HM	11. Shipping Name and Description	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/
a.		NON REGULATED MATERIAL (UNIVERSAL WASTE-MERCURY CONTAINING LAMPS)	002	CF	00050	P
b.		UNIVERSAL WASTE LAMPS NOT USDOT REGULATED (HALOGEN LAMPS)	000	CF	00000	P
c.						
d.						

15. Special Handling Instruction and Additional Information

JCL83151 MFST R/T#106710184 0001-8708-01
EMERGENCY RESP 800-468-1760(24 HR). IF UNDELIVERABLE RETURN TO GENERATOR.
SK CORP AUTH'D TO USE SUBSEQUENT CARRIERS: 40343,41038,81681,82739,86256
TRANS H-~~1273~~ MO-001317-1011
A: OUTS319H B: OUTS319H
H-206B
SKDOT# A: 11518 B: 12830 C: D:
3222 UNIV/OUTS319H H141

USE 16A OR 16B

16a. US DOT HAZARDOUS MATERIALS SHIPPER'S CERTIFICATION: "This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation."
Printed/Typed Name | Signature required here if US DOT regulated | Month Day Ye

16b. NON-REGULATED SHIPPER'S CERTIFICATION: I certify the materials described above on this form are not subject to federal regulations for Transportation or Disposal.
Printed/Typed Name: X JOHN GAY
Sign here if material is not DOT regulated: X J Gay
Month Day Ye: 11 04 0

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Alan Farnan
Signature
Month Day Ye: 11 04 0

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: Adam Kaykendall
Signature
Month Day Ye: 11 11 0

19. Discrepancy Indication Space

FACILITY

20. Facility Owner or Operator: Certification of receipt of materials covered by this form except as noted in Item 19.
Printed/Typed Name: CRAIG
Signature
Month Day Ye: 11 14 0

IN EVENT OF EMERGENCY CALL
1-800-468-1760 (24 hours)

ORIGINAL-RETURN TO GENERATOR
FORM NO. 90291

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
Hazardous Waste Program
P.O. Box 176 Jefferson City, Missouri 65102
573-751-3176

HAZARDOUS WASTE MANIFEST

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENT
INSTRUCTIONS FOR THE COMPLETION OF THIS FORM ARE ON A SEPARATE SH

EMERGENCY RESPONSE	U.S. COAST GUARD 1-800-424-8802	CHEM TREC 1-800-424-9300	DEPT. OF NATURAL RESOURCES 573-634-2436

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2050-0(

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. M O D 0 0 7 1 5 2 9 0 3 — Manifest Document No. 0 1 0 1 7 2 — 2. Page 1 of 1 — Information in the shaded areas is required by State law.

3. Generator's Name and Mailing Address
LITTON INTERCONNECT TECHNOLOGIES - PCBO
4811 WEST KEARNEY STREET, SPRINGFIELD, MO 65803-9579

4. Generator's Phone (471) 862-0751

A. Missouri Manifest Document Number 0 0 1 3 1 7 [redacted] 1 0 1 1

B. G.S.I. (Gen. Site Address)

5. Transporter 1 Company Name: PHILLIPS TRANSPORTATION & REMEDIATION, INC — 6. US EPA ID Number: C A D 0 6 3 5 4 8 9 9 6

C. MO. Trans. ID: H 1148

D. Transporter's Phone: 800-321-1080

7. Transporter 2 Company Name — 8. US EPA ID Number

E. MO. Trans. ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
World Resources Company
8113 W. Sherman St.
Tolleson, Arizona 85353-4025

10. US EPA ID Number: A Z D 9 8 0 7 3 5 5 0 0

G. State Facility's ID: RRAZ03

H. Facility's Phone: 800-972-1955

11. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group (if any))	12. Containers Number	Type	13. Total Quantity	14. Unit Wt/Vol.	I. Waste No.
a. RQ, Hazardous waste, solid, n.o.s., (F006), 9, NA3077, III	0 2 2	C F	0 0 0 2 2	Y	EPA WASTE CODE F 0 0 6 STATE N O N
b. ROUTER DUST, WASTE, NON-HAZ	0 0 5	B A	0 0 0 0 5	Y	EPA WASTE CODE STATE
c.					EPA WASTE CODE STATE
					EPA WASTE CODE STATE

J. Additional Descriptions for Materials Listed Above	K. HANDLING CODE (FACILITY USE ONLY) INTERIM	FINAL	COMMENTS
a. F006 wastewater sludge	a. T 1 8	T 1 8	recycling
b. NON-HAZ	b. T 1 8	T 1 8	recycling
c.	c.		
d.	d.		

15. Special Handling Instructions and Additional Information
24 HOUR EMERGENCY RESPONSE: 1-800-424-9300 CHEMTREC
(USE CHEMTREC COMPANY CODE "WORR") WEAR GLOVES AND GOGGLES "Specific Gravity"
State: CA
Trailer License #: GT0274

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and label and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and th have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a sn quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.

GENERATOR

Printed/Typed Name: JAMI GAY — Signature: Jami Gay — Month 1 1 Day 0 8 Ye 1 0

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Bob Tillman — Signature: Bob Tillman — Date: Month 1 1 Day 0 8 Ye 1 0

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name — Signature — Date: Month Day Ye

FACILITY

19. Discrepancy Indication Space

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: Armando Chavez — Signature: Armando Chavez — Date: Month 1 1 Day 1 5 Ye

EPA FORM 8700-22 (REV. 1-99) MDNR-HWG 10 PREVIOUS EDITIONS ARE OBSOLETE

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
Hazardous Waste Program
P.O. Box 176 Jefferson City, Missouri 65102
573-751-3176

HAZARDOUS WASTE MANIFEST

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.
INSTRUCTIONS FOR THE COMPLETION OF THIS FORM ARE ON A SEPARATE SHEET

EMERGENCY RESPONSE	U.S. COAST GUARD 1-800-424-8802	CHEM TREC 1-800-424-9300	DEPT. OF NATURAL RESOURCES 573-634-2436

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MOD007152903 Manifest Document No. [illegible]
2. Page 1 of 1

Information in the shaded areas is required by State law.

3. Generator's Name and Mailing Address: LITTON INTERCONNECT TECHNOLOGIES INC, 4811 WEST KEARNEY STREET, SPRINGFIELD, MO 65803-8870
4. Generator's Phone (417) 862-0751
5. Transporter 1 Company Name: [illegible]
6. US EPA ID Number: [illegible]
7. Transporter 2 Company Name: [illegible]
8. US EPA ID Number:
9. Designated Facility Name and Site Address: World Resources Company, 8113 W. Sherman St., Tolleson, Arizona 85353-4025
10. US EPA ID Number: AZD980735500

A. Missouri Manifest Document Number: 1317 [redacted] 112
B. G.S.I. (Gen. Site Address)
C. MO. Trans. ID: [illegible]
D. Transporter's Phone: [illegible]
E. MO. Trans. ID
F. Transporter's Phone
G. State Facility's ID: RRAZ03
H. Facility's Phone: 800-972-1955

11. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group (if any))	12. Containers Number	Type	13. Total Quantity	14. Unit Wt/Vol.	I. Waste No.
a. RQ, Hazardous waste, solid, n.o.s., (F006), 9, NA3077, III	022	CF	00027	Y	EPA WASTE CODE F006; STATE NONR
b. ROUTER DUST, WASTE, NON-HAZ	005	BA	00005	Y	EPA WASTE CODE; STATE
c.					EPA WASTE CODE; STATE
d.					EPA WASTE CODE; STATE

J. Additional Descriptions for Materials Listed Above
a. F006 Wastewater sludge
b.
c.
d.

K. HANDLING CODE (FACILITY USE ONLY)

	INTERIM	FINAL	COMMENTS
a.	[illegible]	[illegible]	Recycling
b.			
c.			
d.			

15. Special Handling Instructions and Additional Information
24 HOUR EMERGENCY RESPONSE: 1-800-424-9300 CHEMTREC (USE CHEMTREC COMPANY CODE "WORR") - WEAR GLOVES AND GOGGLES
State: CA
Trailer License #: [illegible]
"Specific Gravity"

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.

Printed/Typed Name: [illegible] GAY | Signature: [signature] | Month Day Year: 11 18 05

GENERATOR

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Rob Tillman | Signature: [signature] | Date Month Day Year: 11 18 05

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Date Month Day Year

TRANSPORTER

19. Discrepancy Indication Space

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name | Signature | Date Month Day Year

FACILITY

SEE INSTRUCTIONS ON BACK OF PART 1 BEFORE FILLING OUT

EPA FORM 8700-22 (REV. 1-99) MDNR-HWG 10

PREVIOUS EDITIONS ARE OBSOLETE

CONTAINS 50% RECYCLED PAPER WHICH INCLUDES NOT LESS THAN 20% POST CONSUMER WASTE.

1. CHEMICAL PRODUCT AND COMPANY INFORMATION

Product ID: ENVIROstrip 785
Generic Description: Inorganic acid
Product Use: Printed Circuit Board Process.

For customer service/technical information, contact:
Morton Electronic Materials
Process Chemicals
15570 N. 83rd. Way
Scottsdale AZ 85260
480-483-5600

MSDS prepared by:
Toxicology and Regulated Substance Compliance
Allan Rosewarne
100 N. Riverside Plaza
Chicago IL 60606
312-807-2916

HAZARD RATINGS		
	HMIS	NFPA
Health	3 *	3
Fire	0	0
Reactivity	0	0
	* = Chronic	

ChemTrec Emergency
1-800-424-9300

2. COMPOSITION/INFORMATION ON INGREDIENTS

COMMON NAME	CAS #	Approximate % (w/w)
Nitric acid	7697-37-2	10 - 30
Water soluble iron salt	Proprietary	5 - 10
Stabilizer	Proprietary	1 - 5
Non-hazardous and other ingredients below reportable levels	Proprietary	Balance

3. HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW: CAUSES SEVERE EYE BURNS. CAUSES SEVERE SKIN BURNS. CAUSES RESPIRATORY TRACT BURNS. CAUSES SEVERE DIGESTIVE TRACT BURNS. INHALATION MAY CAUSE DIZZINESS, HEADACHE AND INCOORDINATION. See sections 3, 5, & 6.

PRIMARY ROUTES OF EXPOSURE: Eye. Skin. Inhalation (breathing).

EYE CONTACT: Causes severe burns and permanent eye damage. Causes severe corneal opacity (clouding of the eye surface). Can cause burning sensation, tearing, and redness.

SKIN CONTACT: Causes severe burns and possibly permanent skin damage.

INHALATION (Breathing): Causes burns to the eyes, nose, and respiratory tract. Can cause dizziness, headaches, and incoordination.

INGESTION (Swallowing): Causes severe burns to the mouth, throat, and stomach.

TARGET ORGANS/CHRONIC EFFECTS: Eyes. Skin.

CONDITIONS AGGRAVATED BY EXPOSURE: Eyes. Skin.

CARCINOGENICITY:

	ACGIH	IARC	NTP	OSHA
Nitric acid	No	No	No	No
Water soluble iron salt	No	No	No	No
Stabilizer	No	No	No	No

4. FIRST AID MEASURES

EYE CONTACT: Immediately flush eyes with plenty of water for at least 15 minutes. Get immediate medical attention.

SKIN CONTACT: Immediately flush with plenty of water for at least 15 minutes. For large exposures use an emergency shower. Remove contaminated clothing and shoes. Get immediate medical attention. Professionally wash clothing before re-use.

INHALATION (Breathing): Remove to fresh air. If symptoms develop, seek immediate medical attention. If not breathing, give artificial respiration.

INGESTION (Swallowing): Get immediate medical attention. Do NOT induce vomiting unless directed by medical personnel. Rinse mouth with water and give another cupful to drink. Never give anything by mouth to an unconscious person.

NOTES TO PHYSICIANS: HIGHLY ACIDIC MATERIAL! Can cause burns. There is danger of hemorrhage and perforation if lavage is performed. No attempt should be made to neutralize the acid with a base. Do not administer bicarbonate of soda by mouth.

5. FIRE FIGHTING METHODS

Flash Point...: Not Applicable Method.....: Not Applicable
Explosive Lmts: LEL(%) Not Applicable UEL(%) Not Applicable
Autoignition..: Not Applicable

HAZARDOUS COMBUSTION AND DECOMPOSITION PRODUCTS: Not applicable. Oxides of nitrogen.

FIRE AND EXPLOSION HAZARDS: Oxidizing agent. Contact with combustible materials can cause a fire.

EXTINGUISHING MEDIA: This material does not burn.

FIRE FIGHTING PROCEDURES/EQUIPMENT: Fire fighters and others who may be exposed to the products of combustion should be equipped with NIOSH-approved positive pressure self-contained breathing apparatus (SCBA) and full protective clothing.

6. ACCIDENTAL RELEASE MEASURES

EVACUATION: Isolate hazard area. Keep unnecessary and unprotected personnel from entering. Corrosive to the eye and skin. Wear appropriate personal protective equipment, including respiratory protection.

CONTAINMENT: Safely stop discharge. Contain material, as necessary, with a dike or barrier. Stop material from contaminating soil, or from entering

sewers or bodies of water.

CLEAN-UP/PERSONAL PROTECTION EQUIPMENT: Appropriate safety measures and protective equipment should be used. Use supplied air respirator or self-contained breathing apparatus in enclosed spaces or if airborne exposure limits can be exceeded. See Section 8.

COLLECTION AND DISPOSAL: Stop discharge, if safe to do so. Use proper protective equipment. Cover spills with absorbent clay or sawdust and place in closed chemical waste containers. Dispose of according to applicable local, state and federal regulations.

REPORTING: Spills of this material in excess of a components's RQ must be reported to the National Response Center (1-800-424-8802) and to the appropriate state and local emergency response organizations.

Nitric acid	
Water soluble iron salt	RQ = 1000 LB
	RQ = 1000 LB

7. HANDLING AND STORAGE

STORAGE CONDITIONS: Store in cool, dry, well ventilated area away from heat, ignition sources, and direct sunlight. Keep containers tightly closed. Protect from freezing.

TRANSFER: No special precautions are needed. Follow good manufacturing and handling practices.

PERSONAL HYGIENE: Wash thoroughly after handling, especially before eating, drinking, smoking, and using restroom facilities. Wash contaminated goggles faceshield, and gloves. Professionally launder contaminated clothing before re-use.

EMPTY CONTAINER PRECAUTIONS: Attention! This container can be hazardous when empty. Follow label warnings even after container is emptied since empty containers may retain product residues. Do not reuse empty container without professional cleaning for food, clothing, or products for human or animal consumption or where skin contact can occur.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

EXPOSURE GUIDELINES:

ACGIH - TLV

Nitric acid		2	ppm
Water soluble iron salt		1	mg/M3
	Iron salts, soluble salts, as Fe		

ACGIH - STEL

Nitric acid			

OSHA - PEL

Nitric acid		4	ppm
Water soluble iron salt		2	ppm
	Iron salts, soluble salts, as Fe	1	mg/M3

ENGINEERING CONTROLS/VENTILATION: Local exhaust ventilation is recommended

when vapors, mists, or dusts can be released in excess of established airborne exposure limits (TLVs or PELs)..

EYE PROTECTION: Wear chemical splash goggles and a full-face shield. An eye wash facility should be readily available.

SKIN PROTECTION: Wear rubber boots and apron, protective clothing, and impervious gloves. Because a variety of protective gloves exist, consult glove manufacturer to determine the proper type for a specific operation. An emergency shower should be readily available.

RESPIRATORY PROTECTION: Avoid breathing vapor and/or mists. Wear NIOSH/MSHA-approved equipment. Determine the appropriate type by consulting the respirator manufacturer. High airborne concentrations may necessitate the use of self-contained breathing apparatus (SCBA) or a supplied air respirator. Respiratory protection programs must be in compliance with 29 CFR 1910.134.

9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance....: Clear to amber	Odor.....: Acrid
Physical State: Liquid	Solubility....: Completely soluble
pH.....: Not Determined	Boiling Point.: > 200F 93.3C
Freeze/Melt...: < 40F 4.4C	Vapor Pressure: Not Determined
Vapor Density.: Not Determined	Evaporation Rt: Approximately 1 Water
VOC Material..: 0 g/L 0 lbs/gal	Specific Grvty: 1.2
%Non-Vol(w/w).: 100	

NOTE: The physical data presented above are typical values and should not be construed as a specification.

10. STABILITY AND REACTIVITY

CHEMICAL STABILITY: Stable under normal conditions of use.

HAZARDOUS POLYMERIZATION: Will not occur.

CONDITIONS TO AVOID: Not applicable.

INCOMPATIBILITY WITH OTHER MATERIALS: Water. Amines. Reducers. Strong bases. Amphoteric metals (i.e., copper, aluminum, zinc). Ammonia.

11. TOXICITY INFORMATION

COMPONENTS:

Nitric acid:
Corrosive! Causes eye and skin burns.

Water soluble iron salt:
Chronic exposure can cause cardiovascular, liver, and kidney damage.

Stabilizer:
Chronic oral administration produced lung carcinomas in female mice and brain tumors in rats. These studies have not been accepted by the IARC, NTP, or OSHA.

Oral LD50	Rat	560 mg/kg
Dermal LD50	Rabbit	2,000 mg/kg
Inhalation LC50	Rat	5,700 mg/M3/1 hour

12. ECOLOGICAL INFORMATION

No data are available on this product.

13. DISPOSAL CONSIDERATIONS

DISPOSAL: When a decision is made to discard this material as supplied, it meets RCRA's characteristic definition of corrosivity.

GENERAL STATEMENTS: Federal regulations may apply to empty container. State and/or local regulations may be different.

GENERAL RECOMMENDATIONS: Of the methods of disposal currently available, it is recommended that an alternative be selected according to the following order of preference, based upon environmental acceptability: (1) recycle or rework, if feasible; (2) incinerate at an authorized facility; or (3) treat at an acceptable waste treatment facility.

SPECIAL INSTRUCTIONS: Be sure to contact the appropriate government environmental agencies if further guidance is required.

14. TRANSPORT INFORMATION

Weight (lb)	Shipping Name	49 CFR	IATA	IMO
	Corrosive liquid, acidic, inorganic, n.o.s. (nitric acid)	Y	Y	Y

DOT Label.....: Corrosive
DOT Label No..: NE
Hazard Class..: 8 (IATA/49CFR)
Packing Group.: II
UN/NA Id Num..: UN 3264

15. REGULATORY INFORMATION

FEDERAL:

This product is considered hazardous under the OSHA Hazard Communication Standard (29 CFR 1910.1200).

SARA Title III - Section 311/312 - Hazard Categories:
N- Fire Hazard
N- Sudden Release of Pressure Hazard
Y- Reactivity Hazard
Y- Immediate (acute) Health Hazard
Y- Delayed (chronic) Health Hazard

Ozone-Depleting Chemicals - No regulated ingredients.

SARA Section 302 Extremely Hazardous Mat
Nitric acid

SARA Section 313 Toxic Chemicals
Nitric acid

CHEMICAL LISTING - Listed on the following Country's Chemical Inventories:

United States Toxic Substance Control Act
Chemical component(s) in this product are on the section 8(b) Chemical Substance Inventory List (40 CFR 710).

STATE RIGHT-TO-KNOW:

Pennsylvania - New Jersey R-T-K

Water		
Nitric acid	7732-18-5	60 - 100
Environmental and Special Hazard.	7697-37-2	10 - 30
Water soluble iron salt	Proprietary	5 - 10
Environmental Hazard.		
Stabilizer	Proprietary	1 - 5
Non-hazardous trade secret ingredient(s)	Proprietary	Balance

California - California Proposition 65 - No regulated ingredients.

CONEG - No data available.

CANADA:
This is a "controlled product" under the Canadian Workplace Hazardous Materials Information System (WHMIS).

Class D Division 2 Sub-division B Class E Division 0

CEPA - NPRI
Nitric acid

16. OTHER INFORMATION

USERS RESPONSIBILITY: A bulletin such as this cannot be expected to cover all possible individual situations. As the user has the responsibility to provide a safe workplace, all aspects of an individual operation should be examined to determine if, or where, precautions - in addition to those described herein - are required. Any health hazard and safety information herein should be passed on to your customers or employees, as the case may be.

DISCLAIMER OF LIABILITY: The information contained herein is, to the best of our knowledge and belief, accurate. However, since the conditions of handling and use are beyond our control, we make no guarantee of results, and assume no liability for damages incurred by use of this material. All chemicals may present unknown health hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards which exist. Final determination of suitability of the chemical is the sole responsibility of the user. No representations or warranties, either expressed or implied, of merchantability, fitness for a particular purpose or any other nature are made hereunder with respect to the information contained herein or the chemical to which the information refers. It is the responsibility of the user to comply with all applicable federal, state and local laws and regulations.

End of Material Safety Data Sheet

j_gay@littoninterconnect.com

12/08/2005 09:48 AM

To Trevor Urban/ENSV/R7/USEPA/US@EPA

cc

bcc

Subject Micronutrients documentation

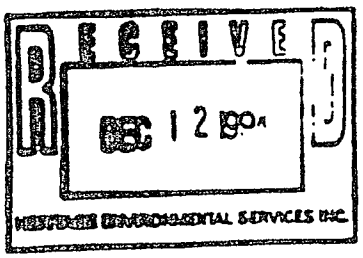
Attached is information that show that Micronurients is a legitimate recycler of our spent etchant.

Jami Gay
Environmental Engineer
Northrop Grumman - Litton Systems, Inc.
4811 W. Kearney Springfield, MO. 65803
417-829-5350 Fax - 831-5239

letters for northop 12-05.pdf

NOV 15 1994

Mr. Eli Eilbott
Deputy General Counsel
Environmental Technology Council
915 15th Street
Fifth Floor
Washington, D.C. 20005



R-19J

Dear Mr. Eilbott:

Thank you for your October 17, 1994, letter expressing your concern about the recent solid waste exemption approval for Heritage Environmental Services, Inc. (Heritage) by the Indiana Department of Environmental Management (IDEM). On behalf of the Environmental Technology Council (ETC), you requested a review by the United States Environmental Protection Agency (U.S. EPA) Region 5 of this exemption approval by the IDEM. The U.S. EPA Region 5 has concluded that IDEM's ruling is consistent with use/reuse exemption requirements specified at Title 40 Code of Federal Regulations (40 CFR) Part 261.

As you are aware, the State of Indiana is authorized by the U.S. EPA to administer the base portion of the Resource Conservation and Recovery Act (RCRA) program, which includes regulations addressing the definition of solid and hazardous waste. The State of Indiana Administrative Code is consistent with and no less stringent than Federal requirements, and specifies criteria identical to that in 40 CFR Part 261 for solid/hazardous waste exemptions.

My staff conducted a detailed review of supporting documentation and consulted with IDEM staff and Heritage representatives. The research indicates that the State's exemption determination does not conflict with Federal requirements. Consequently, the U.S. EPA Region 5 concurs with the IDEM that the copper salt manufacturing process constitutes legitimate use/reuse of hazardous waste to produce a commercial product pursuant to 40 CFR 261.1(c)(5) and 261.2(e)(1).

We appreciate the keen interest of ETC in this matter and many other emerging regulatory issues, and its active participation in the Definition of Solid Waste Roundtable. If I can be of any further assistance, please do not hesitate to contact me or Mr. Hak Cho of my staff, at (312) 886-0988.

Sincerely yours,

/s/ original signed by
Valdas V. Adamkus

Valdas V. Adamkus
Regional Administrator

HERITAGE
CONFIDENTIAL

FILE COPY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 24 1996

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

Mr. Peter H. Weiner
Heller, Ehrman, White, and McAuliffe
333 Bush St.
San Francisco, California 94104-2878

Dear Mr. Weiner:

Thank you for your letter of March 12, 1996 regarding the regulatory status under the Resource Conservation and Recovery Act (RCRA) of spent copper etchants managed by Heritage Environmental Services, Inc. ("Heritage"). You raised an important question, and we appreciate your interest in this matter. I hope the following discussion addresses your concerns.

As we understand it, Heritage receives spent etchants from the manufacturers of printed wire boards. At its facility in Indiana, Heritage then uses the etchants to produce tri-basic copper chloride (TBCC), an animal micronutrient. A residue generated in the TBCC manufacuring process is then treated by adding additional chemicals to produce "fresh" alkaline etchant. Heritage argues that they are using the spent etchant as an ingredient in an industrial process to make a product (i.e, TBCC). This kind of use would exclude the etchant from the definition of solid waste as long as no reclamation occurred (see 40 CFR 261.2(e)(1)(i), adopted verbatim by the State of Indiana at 329 IAC 3.1)). The Indiana Department of Environmental Management (IDEM) has determined that the spent etchant at Heritage's facility is indeed being used as an ingredient in an industrial process, and that this use meets the terms of the regulatory exclusion.

As stated in your letter, you believe that Indiana was incorrect in its interpretation, and you asked the Environmental Protection Agency (EPA) to request that the state revise its determination. Your belief is based upon the Agency's preamble discussion of this regulation at 50 FR 614, 619 (codified at 40 CFR 261.1(c)(5)(i)). In that discussion, EPA stated that "when distinct components of the material are recovered as separate end products (i.e., recovering lead from scrap metal in smelting operations), the secondary material is not being used, but rather reclaimed and thus, would not be excluded under this provision". Since Heritage is producing separate products at its plant (i.e., TBCC and "new"etchant), you have argued that reclamation is occurring which would disqualify the entire process from exclusion under 40 CFR 261.2(e)(1)(i).

At issue in this case are two operations. In the first operation, a spent material is used as an ingredient to make a product (TBCC), resulting in a residue. The second operation uses the

residue from the first to make another product (fresh etchant), but the second operation may involve reclamation (although the IDEM has not made a formal determination on this point). If we assume reclamation occurs in the second operation, the question is whether a facility would be barred from claiming the use-as-ingredient exclusion because of the subsequent reclamation. The answer to this question depends on whether the operations are considered to be one industrial "process" (in which case the reclamation would presumably disqualify the facility from claiming the exclusion) or two sequential "processes" (in which case the reclamation in a subsequent process would not generally nullify the exclusion).

RCRA regulations, preambles, and past interpretations do not define how many (or how few) operations may be included in an industrial process. In EPA's experience, situations at different facilities vary so much that it is not possible to develop a general rule about whether operations should be considered one process or multiple processes. The Agency believes that any such rule would inevitably be too inflexible to address the many different types of industrial operations being conducted throughout the country. For this reason, we have historically left the determination of this question to States authorized to administer and enforce the RCRA program under section 3006, or to EPA Regions where the State is is not authorized. A uniform national interpretation would not be adequate to address the large variety of circumstances prevailing at different industrial facilities. States and Regions are more competent to evaluate the site-specific factors that must necessarily enter into this kind of decision.

We have consulted with Region V after their meeting on June 25, 1996 with representatives from Phibrotech, the Illinois Environmental Protection Agency, and the IDEM. The Region and the States would like to thank Messrs. Jack Benheim and Tom Moran for taking the time to further discuss these issues with them. As you are aware, most of the issues discussed during the meeting had been evaluated before, but the discussions served to underscore the complexity of these regulatory determinations, particularly with respect to the Heritage operation. Follow-up discussions between Region V and the IDEM indicate that the IDEM remains committed to its original ruling on the Heritage process.

Based on our discussions with Region V and the State of Indiana, and a review of existing policy, we believe that Indiana's interpretation of 40 CFR 261.2(e)(1)(i) is not inconsistent with the language of this provision. For this reason, we will not request the State to revise its determination.

As you may be aware, EPA is currently engaged in an effort to change the RCRA regulations governing hazardous waste recycling. This effort has three goals. First, we want to clarify and simplify these regulations to make them more "user-friendly" for all concerned, while still fully protecting human health and the environment. We also want to remove disincentives that may lead industries to dispose of their wastes rather than reusing them. As part of this effort, we plan to reexamine and possibly change the current regulatory distinctions between "reuse" and "reclamation". The Agency hopes to propose these regulatory revisions in early 1997.

Thank you again for the time and attention you have devoted to this matter. These are important environmental issues, and we appreciate your concern. If you have any questions, please call me at 703-308-8895.

Sincerely yours,

Elizabeth A. Cotsworth

Elizabeth A. Cotsworth, Deputy Director
Office of Solid Waste

STATE OF MISSOURI

Mel Carnahan, Governor • David A. Shorr, Director

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

November 20, 1995

NOV 27 1995

Ms. Jan M. Dillow
Regional Vice President
Heritage Environmental Services, Inc.
8525 N.E. 38th Street
Kansas City, MO 64161

Dear Ms. Dillow:

Our office has reviewed the contents of your document received on October 2, 1995, describing the use of certain copper-containing secondary materials to manufacture a product. In the letter accompanying the document, you ask the Hazardous Waste Program of the Missouri Department of Natural Resources (MDNR) to concur that the type of materials used in the manner described in the document would be exempt from the Missouri Hazardous Waste Management Law and Regulations pursuant to the use/reuse provisions of 40 CFR 261.2(e) which is incorporated in 10 CSR 25-4.261.

If the material is screened and used as described in your document, our office agrees that the material is exempt from regulation as a solid waste under the use/reuse provisions of 40 CFR 261.2(e). Additionally, our office reiterates the determination by the Indiana Department of Environmental Management in its letter dated April 15, 1994, to Mr. Gary F. Lindgren, that documentation of compliance with 40 CFR 261.2(f) is required. The material must also be used to avoid speculative accumulation according to 40 CFR 261.1(c)(8).

Please contact me at (314) 751-3176 if you have any questions regarding this letter.

Sincerely,

HAZARDOUS WASTE PROGRAM

Ed Sadler
Director

ES:kfd

c: Mr. Gary F. Lindren, Heritage Environmental Services, Inc.

RECYCLED PAPER

ATTACHMENT 12 Page 6 of 6

WEEKLY ENVIRONMENTAL INSPECTION

Date of Inspection: 11/4/2005

Haz, NonHaz, Universal Wastes/Emergency Response Equip/Grounds/Recycled Wastestreams

X = satisfactory

	WASTE STORAGE AREA	BULL PEN					POGs								
WASTE STORAGE		Pb Contam Debris	Flam rags	PISM inks	NON HAZ Ni contam	NON HAZ Router Dust	WWT Sludge bins	Aerosol Residue	M/L Flam rags	AO Pb contam debris	AO Flux	AO ToolRoom Flam Rags	PISM Flam rags	PISM inks	Haico Pb Contam Debris
Containers closed		X	X	na	na	X	X	X	NO	X	X	X	X	no	X
CORROSION/ DAMAGE		X	X	na	na	X	X	X	X	X	X	X	X	X	X
INCOMPATIBLE MATLS W/I 50'		X	X	na	na	X	X	X	X	X	X	X	X	X	X
# OF CONTAINERS in storage area		2	3	1	0	4	19	1	1	1	1	1	1	1	1
Date on Container		9/18/2005	9/18/2005	---	---	---	10/3/2005	6/27/2005	10/28/2005	9/18/2005	1/24/2005	9/2/2005	11/8/2004	8/31/2005	8/31/2005

UNIVERSAL WASTES	Batteries	Hg containing articles	Fluor Tube Lamps	Fluor Bulbs misc.			COMMENTS:	Audit Pb contam rags	Gold Filters	Planarizer Corrosive	NON HAZ Nickel Contam	<-- MORE PGS
ALL CONTAINERS CLOSED	X	X	X	X			Barrel Wash area is disorganized/messy.	X	X	X	X	Containersclosed
ALL CONTAINERS DATED	X	X	X	X				X	X	X	X	CORROSION/ DAMAGE
CORROSION/DAMAGE	X	X	X	X				X	X	X	1	INCOMPATIBLE MATLS W/I 50'
# OF CONTAINERS	3	1	3	1				1	1	1	1	# OF CONTAINERS
DATE OF OLDEST CONTAINER	4/26/2005	3/1/2005	8/18/2005	8/15/2005				9/30/2005	9/19/2005	10/5/2005	---	Date on Container

Recycled / Reclaimed Wastes	CIRCUIT DES. M/L	BOARD Rout	SCRAP Scrap	COMMENTS:	Solder Dross	Spent Oil	Wood Pallet Area	COMMENTS:
# Box(es) of CBS present	2	1	2		X	NA	PALLET PICKUP	
Materials not contained in box?	X	X	X		X	NA	still needed.	
Chemical Storage area on West end --outside of metal shed	OK				X	NA		
Area around trash compactor at Warehouse (E. side)\	Little pieces of metal & wood on ground on W. side of compactor.				8	NA	Asphalt chunks piled by hoppers/pallets.	
Area around trash compactor on West end	Area clean and neat. Much improved.				NA	NA		
Area around trash compactor by Receiving dock	Trash/leaves/debris on ground.							

MISCELLANEOUS							COMMENTS:
Spill response equip :	*Lime/sand*	*Skid Loader*	*Shovel, Drums*	*CY bags*	*Caustic soda*		
	X	X	X	X	X		
Stormwater Filter at Receiving Dock-- 1X/Qtr Change	Last filter change:	9/26/2005	CLEAN SW DRAIN AREA OF STYROFOAM/LEAVES				

ASTs Inspection	Condition	Leaks, deteriora tion	Oil accum in tanks	2ndary contam-inant			COMMENTS:
Used oil tanks (3)	DIRTY	X	very little	DIRTY			
Defoamer totes	X	X	NA	X			
55 gallon drums	X	X	NA	X			

INSPECTOR'S NAME (PRINT): JAMI GAY

Signature: Jami Gay

01Env18.10/05

ATTACHMENT 13 Page 1 of 5

WEEKLY ENVIRONMENTAL INSPECTION

Date of Inspection: 11/11/2005

Haz, NonHaz, Universal Wastes/Emergency Response Equip/Grounds/Recycled Wastestreams

X = *satisfactory*

	WASTE STORAGE AREA						BULL PEN	Satellite Waste - POINTS OF GENERATION								
WASTE STORAGE		Pb Contam Debris	Flam rags	PISM Inks	NON HAZ Ni contam	NON HAZ Router Dust	WWT Sludge bins	Aerosol Residue	M/L Flam rags	AO Pb contam debris	AO Flux	Audit Pb contam rags	PISM Flam rags	PISM Inks	Halco Pb Contam Debris	AO ToolRoom Flam Rags
ALL CONTAINERS CLOSED		x	x	na	na	na	x	x	x	x	x	x	x	x	x	x
ALL CONTAINERS DATED		x	x	na	na	na	x	x	x	x	x	x	x	x	x	x
CORROSION / DAMAGE		x	x	na	na	na	x	x	x	x	x	x	x	x	x	x
# OF CONTAINERS		0	1	0	0	0	3	1	1	1	1	1	1	1	1	1
DATE OF OLDEST CONTAINER		—	11/8/2005	—	—	—	11/7/2005	6/27/2005	10/28/2005	9/18/2005	1/24/2005	9/30/2005	11/4/2005	8/31/2005	8/31/2005	9/2/2005

UNIVERSAL WASTES	Batteries	Hg containing articles	Fluor Tube Lamps	Fluor Bulbs misc.	COMMENTS:
ALL CONTAINERS CLOSED	x	x	x	NO	All waste containers moved together this week for storage. This puts us more in compliance.
ALL CONTAINERS DATED	x	x	x	x	
CORROSION / DAMAGE	x	x	x	x	
# OF CONTAINERS	1	1	1	1	
DATE OF OLDEST CONTAINER	10/14/2005	3/1/2005	5/23/2005	8/15/2005	

<--- MORE POGS	Gold Filters	Planarizer Corrosive	NON HAZ Nickel Contam	COMMENTS:
ALL CONTAINERS CLOSED	x	x	x	
ALL CONTAINERS DATED	x	x	x	
CORROSION / DAMAGE	x	x	x	
# OF CONTAINERS	1	1	1	
DATE OF OLDEST CONTAINER	9/19/2005	10/5/2005	—	

Recycled / Reclaimed Wastes	CIRCUIT DES M/L	BOARD Rout	SCRAP Scrap Room	Solder Dross	Spent Oil	Wood Pallet Area	COMMENTS:
# Box(es) of CBS present	2	1	2				On Wednesday, Springfield Pallet picked up ~350 pallets. 89 are left. Next PU will be 11/18.
Materials contained in box?	x	x	x				Area looks much better. All those bringing out pallets must stack neatly.
Chemical Storage area West end –outside of metal shed	x						There are 2 equip pallets, 1 4'X4' strewn in area. This happened Thurs. or on Fri. morning.
Area around compactors @ Warehouse (E. side)	Wood debris/metal pieces still on ground on W. side of compactor. 29 pallets stacked, 10 pallets strewn by compactor. Should all be moved/stacked neatly in bullpen for recycling pickup on 11/18.						
Trash compactor area @ West end	X	Looks very neat.					
Area around trash compactor @ Receiving	Area must be kept clean of leaves/trash/debris.						

MISCELLANEOUS							COMMENTS:
Spill response equip :	Lime/sand	Skid Loader	Shovel, Drums	CY bags	Caustic soda		There are 8 drums of Nitric, 8 drums or LWT 7304, & 1 drum of Ethylene glycol sitting by the returnable drum enclosure. These must be stored under cover and on containment pallets for stormwater compliance.
	x	x	x	x	x		
Stormwater Filter at Receiving Dock– Change 1X/Qtr	Last filter change:	9/26/2005	Area must be kept clean of leaves/trash/debris.				

Aboveground Storage Tanks	Condition	Leaks, deterioration	Oil accum. in tanks	2ndary containment			COMMENTS:
Used oil/virgin diesel tanks (3)	Dirty	x	very little	Dirty.			Sector said containment area should be cleaned.
Defoamer totes	x	x	na	x			
55 gallon drums	x	x	na	x			

INSPECTOR'S NAME (PRINT): JAMI GAY

Signature:

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WEEKLY ENVIRONMENTAL INSPECTION

Date of Inspection: 11/18/2005

Haz, NonHaz, Universal Wastes/Emergency Response Equip/Grounds/Recycled Wastestreams

X = satisfactory

	WASTE STORAGE AREA				BULL PEN			Satellite Waste - POINTS OF GENERATION							
WASTE STORAGE		Pb Contam Debris	Flam rags	PISM inks	NON HAZ Ni contam	NON HAZ Router Dust	WWT Sludge bins	Aerosol Residue	M/L Flam rags	AO Pb contam debris	AO Flux	AO ToolRoom Flam Rags	PISM Flam rags	PISM inks	Halco Pb Contam Debris
ALL CONTAINERS CLOSED		x	x	na	na	na	x	x	x	x	x	x	no	x	x
ALL CONTAINERS DATED		x	x	na	na	na	x	x	x	x	x	x		x	x
CORROSION/DAMAGE		x	x	na	na	na	x	x	x	x	x	x		x	x
# OF CONTAINERS		0	1	0			8	1	1	1	1	1	1	1	1
DATE OF OLDEST CONTAINER		---	11.8.05	---	---	---	11.7.05	6.27.05	10.28.05	9.18.05	1.24.05	9.2.05			

	Other Satellite Waste - POINTS OF GENERATION				
UNIVERSAL WASTES	Audit Pb contam rags	Gold Filters	Planarizer Corrosive	NON HAZ Nickel Contam	<-- MORE PDGS
ALL CONTAINERS CLOSED	x	x	x	x	
ALL CONTAINERS DATED	x	x	x	x	
CORROSION/DAMAGE	x	x	x	x	
# OF CONTAINERS	1	1	1	1	
DATE OF OLDEST CONTAINER	9.30.05	9.19.05	10.5.05	---	

UNIVERSAL WASTES	Batteries	Hg containing articles	Fluor Tube Lamps	Fluor Bulbs misc.		
ALL CONTAINERS CLOSED	x	x	x	x		
ALL CONTAINERS DATED	x	x	x	x		
CORROSION/DAMAGE	x	x	x	x		
# OF CONTAINERS	1	1	2	1		
DATE OF OLDEST CONTAINER			5.23.05	8.15.05		

COMMENTS:

WWT SLUGE bin outside – 3077 sticker coming off.

Barrel wash area is a mess. Needs drums washed out & set neatly.

Recycled / Reclaimed Wastes	CIRCUIT DES M/L	BOARD Rout	SCRAP Scrap Room	COMMENTS:
# Box(es) of CBS present	2	1	2	
Materials contained in box?	x	x	Boxes overflowing	
Chemical Storage area West end - -outside of metal shed	x		Neat & clean?	
Area around compactors @ Warehouse (E. side)	Wood debris/metal pieces still on ground. Needs swept up. Pallets must be stacked for pick up.			
Trash compactor area @ West end	Looks great.		Neat & clean?	
Area around trash compactor @ Receiving dock	Leaves/trash/debris in area.		Neat & clean?	

Solder Dross: 8 buckets

Wood Pallet Area: ~200 pallets loaded by Facility Maintenance.

Pickups will now occur every other Friday routinely.

COMMENTS:

MISCELLANEOUS						
Spill response equip :	Lime/sand	Skid Loader	Shovel, Drums	CY bags	Caustic soda	
	x	x		x	x	
	Sock filter		Receiving dock			
Stormwater Filter-Receiving Dock- -1X/Qtr Change. Last filter change:	Last filter change:	9/26/2005	Leaves/trash/debris in drain. Stormwater issue.			

COMMENTS:

4 drums of CN waste in process of being put in drums/labelled.

Aboveground Storage Tanks	Condition	Leaks deterioration	Oil accum in tanks	2ndary containment		
Used oil/virgin diesel tanks (3)	dirty	x	little	dirty		
Defoamer totes	x	x	x	x		
55 gallon drums	x	x	x	x		

COMMENTS:

8 drums of Nitric Acid, 8 drums of LWT 7403, 1 drum of ethylene glycol sitting in front of drum storage cage. These MUST be under cover, on containment pallets to be in compliance.

INSPECTOR'S NAME (PRINT): JAMI GAY

Signature: [signature] 11/18/05

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ATTACHMENT 13 Page 3 of 5

WEEKLY ENVIRONMENTAL INSPECTION

Date of Inspection: 11/23/2005

Haz, NonHaz, Universal Wastes/Emergency Response Equip/Grounds/Recycled Wastestreams

X = satisfactory

	WASTE STORAGE AREA				BULL PEN			Satellite Waste - POINTS OF GENERATION							
WASTE STORAGE	Waste CN Sol.	Pb Contam Debris	Flam rags	PISM inks	NON HAZ Ni contam	NON HAZ Router Dust	WWT Sludge bins	Aerosol Residue	M/L Flam rags	AO Pb contam debris	AO Flux	AO ToolRoom Flam Rags	PISM Flam rags	PISM inks	Halco Pb Contam Debris
ALL CONTAINERS CLOSED	x	x	x	na	na	na	x	x	x	x	x	x	no	no	x
ALL CONTAINERS DATED	x	x	x	na	na	na	x	x	x	x	x	x	x	x	x
CORROSION/DAMAGE	x	x	x	na	na	na	x	x	x	x	x	x	x	x	x
# OF CONTAINERS	4	1	1	0		1	12	1	1	1	1	1	1	1	1
DATE OF OLDEST CONTAINER	11.14.2005	~~9.48.2005~~ 11/21/05	11.8.05	na	na	na	11.7.05	6.27.05	10.28.05	11.21.05	1.24.05	9.2.05	11.4.05	8.31.05	8.31.2005

								Other Satellite Waste - POINTS OF GENERATION				
UNIVERSAL WASTES	Batteries	Hg containing articles	Fluor Tube Lamps	Fluor Bulbs misc.			COMMENTS:	Audit Pb contam rags	Gold Filters	Planarizer Corrosive	NON HAZ Nickel Contam	<-- MORE PDGS
ALL CONTAINERS CLOSED	x	x	x	x			AO Flux container at POG is close to 1 yr of accum.	x	x	x	x	ALL CONTAINERS CLOSED
ALL CONTAINERS DATED	x	x	x	x			Drum of Cu Foil needs put into Commercial Metals	x	x	x	x	ALL CONTAINERS DATED
CORROSION/DAMAGE	x	x	x	x			hopper.	x	x	x	x	CORROSION/DAMAGE
# OF CONTAINERS	1	1	2	1			Empty Flux/Film Kleen cans piled by Sludge	1	1	1	1	# OF CONTAINERS
DATE OF OLDEST CONTAINER	10.14.05	3.1.05	5.23.05	8.15.05			room door. DISPOSE.	9.30.05	9.19.05	10.5.05	---	DATE OF OLDEST CONTAINER

Recycled / Reclaimed Wastes	CIRCUIT DES M/L	BOARD Rout	SCRAP Scrap Room	COMMENTS:	Solder Dross	Wood Pallet Area	COMMENTS:
# Box(es) of CBS present	2	1	2		8 buckets	~40 pallets stacked neatly in Bullpen awaiting next pickup.	
Materials contained in box?	x	x	x				
Chemical Storage area West end --outside of metal shed	Great!	Neat & clean?				Pickups will now occur every other Friday routinely.	
Area around compactors @ AO (East side)	Debris still on ground & need swept up. ~40 pallets are stacked neatly for pick up, but 3 pallets stacked by Compactor need moved/stacked.						
Trash compactor area @ West end	Excellent!	Neat & clean?				Prod. equipment pallets (4-5) left by hoppers. Need stacked in proper location.	
Area around compactor @ Receiving dock	Leaves/trash/debris		Neat & clean?				

MISCELLANEOUS							COMMENTS:
CIT equipment:	Lime/sand	Skid Loader	Shovel, Drums	CY bags	Caustic soda		
	x	x	x	x	x		
	Sock filter:		Receiving dock				
Stormwater Filter-Receiving Dock--1X/Qtr filter change.	Last filter change:	9/26/2005	Leaves/trash/debris in drain. Stormwater issue.				

Aboveground Storage Tanks	Condition	Leaks, deterioration	Oil accum in tanks	2ndary containment			COMMENTS:
Used oil/virgin diesel tanks (3)	dirty	x	little	dirty			12 drums of Nitric Acid, 8 drums of LWT 7403, 1 drum of ethylene glycol sitting out in front
Defoamer totes	x	x	x	x			of drum storage cage. These must be under roof & on containment pallets to be in
55 gallon drums	x	x	x	x			compliance.

INSPECTOR'S NAME (PRINT): Jami Gay

Signature: Jami Gay

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WEEKLY ENVIRONMENTAL INSPECTION

Date of Inspection: 12/2/2005

Haz, NonHaz, Universal Wastes/Emergency Response Equip/Grounds/Recycled Wastestreams

X = satisfactory

	WASTE STORAGE AREA					BULL PEN		Satellite Waste - POINTS OF GENERATION							
WASTE STORAGE	Waste CN Sol.	Pb Contam Debris	Flam rags	PISM inks	NON HAZ Ni contam	NON HAZ Router Dust	WWT Sludge bins	Aerosol Residue	M/L Flam rags	AO Pb contam debris	AO Flux	AO ToolRoom Flam Rags	PISM Flam rags	PISM Inks	Halco Pb Contam Debris
ALL CONTAINERS CLOSED	x	x	x	na	na	na	x	x	x	x	x	x	x	x	x
ALL CONTAINERS DATED	x	x	x	na	na	na	x	x	x	x	x	x	x	x	x
CORROSION/DAMAGE	x	x	x	na	na	na	x	x	x	x	x	x	x	x	x
# OF CONTAINERS	0	1	1	0		1	19	1	1	1	1	1	1	1	1
DATE OF OLDEST CONTAINER	—	11.21.2005	11.8.05	na	na	na	11.7.05	6.27.05	10.28.05	11.21.05	1.24.05	9.2.05	11.4.05	8.31.05	8.31.2005

								Other Satellite Waste - POINTS OF GENERATION				
UNIVERSAL WASTES	Batteries	Hg containing articles	Fluor Tube Lamps	Fluor Bulbs misc.			COMMENTS:	Audit Pb contam rags	Gold Filters	Planarizer Corrosive	NON HAZ Nickel Contam	<— MORE PO85
ALL CONTAINERS CLOSED	x	x	x	x				x	x	x	x	ALL CONTAINERS CLOSED
ALL CONTAINERS DATED	x	x	x	x				x	x	x	x	ALL CONTAINERS DATED
CORROSION/DAMAGE	x	x	x	x				x	x	x	x	CORROSION/DAMAGE
# OF CONTAINERS	1	1	2	1				1	1	1	1	# OF CONTAINERS
DATE OF OLDEST CONTAINER	10.14.05	3.1.05	5.23.05	8.15.05				9.30.05	9.19.05	10.5.05	—	DATE OF OLDEST CONTAINER

Recycled / Reclaimed Wastes	CIRCUIT DES M/L	BOARD Rout	SCRAP Scrap Room	COMMENTS:	Solder Dross	Wood Pallet Area COMMENTS:
# Box(es) of CBS present	2	1	2		8 buckets	-30 pallets stacked neatly in Bullpen awaiting pickup later today.
Materials contained in box?	x	x	x			-50 pallets stacked neatly by AO warehouse awaiting pickup later today..
Chemical Storage area West end –outside of metal shed	Looking Great!	Neat & clean?				
Area around compactors @ AO (East side)	Looks good.					
Trash compactor area @ West end	Excellent!	Neat & clean?				
Area around compactor @ Receiving dock	Leaves/trash/debris		Neat & clean?			

MISCELLANEOUS:							COMMENTS:
CIT equipment:	Lime/sand	Skid Loader	Shovel, Drums	CY bags	Caustic soda		
	x	x	x	x	x		
Stormwater Filter-Receiving Dock–1X/Qtr filter changed.	Sock filter		Receiving dock				
	Last filter change:	9/26/2005	Leaves/trash/debris in drain. Stormwater issue.				

Aboveground Storage Tanks	Condition	Leaks, deterioration	Oil accum in tanks	2ndary containment			COMMENTS:
Used oil/virgin diesel tanks (3)	dirty	x	little	dirty			Drums of chemistry sitting in front of drum storage cage.
Defoamer totes	x	x	x	x			These must be under roof & on containment pallets to be in
55 gallon drums	x	x	x	x			stormwater compliance. USEPA will be on site 12/15 to evaluate our permit.

INSPECTOR'S NAME (PRINT): Jami Gay

Signature: J Gay

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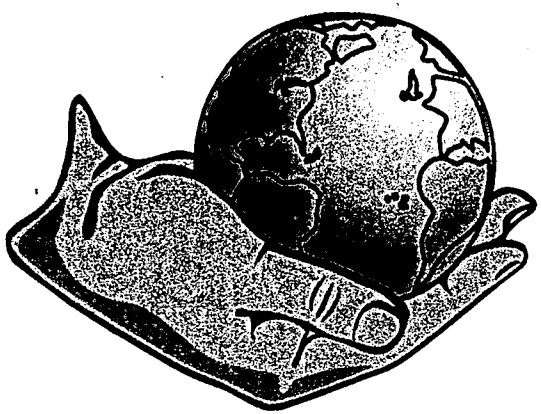
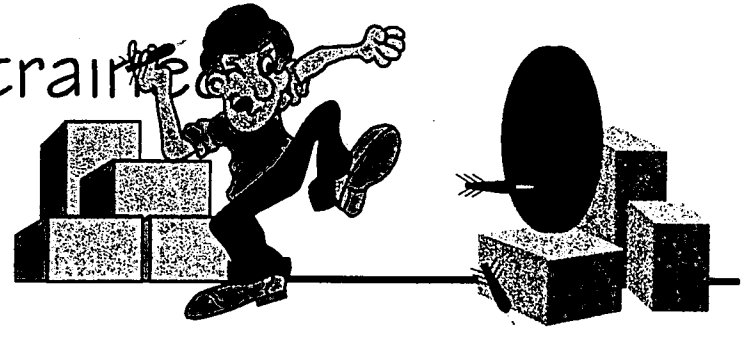


Resource Conservation and Recovery Act

2005

WHO REQUIRES ANNUAL RCRA TRAINING?

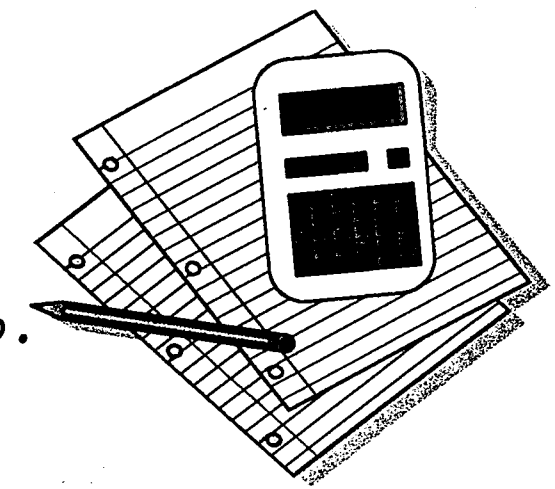
- "....a person who is employed by a HazMat employer and who in the course of employment directly affects hazardous materials transportation safety." [49 CFR 171.8]
- In plain language----if you can cause non-compliance, you must be trained.



RCRA affects many jobs/duties. . . .

- Some individual jobs are tailored to comply with RCRA regs (WWT, Plating Maint, etc.)

- Safety training on workplace hazards, accident avoidance & response, HazComm etc. interrelate to RCRA requirements.

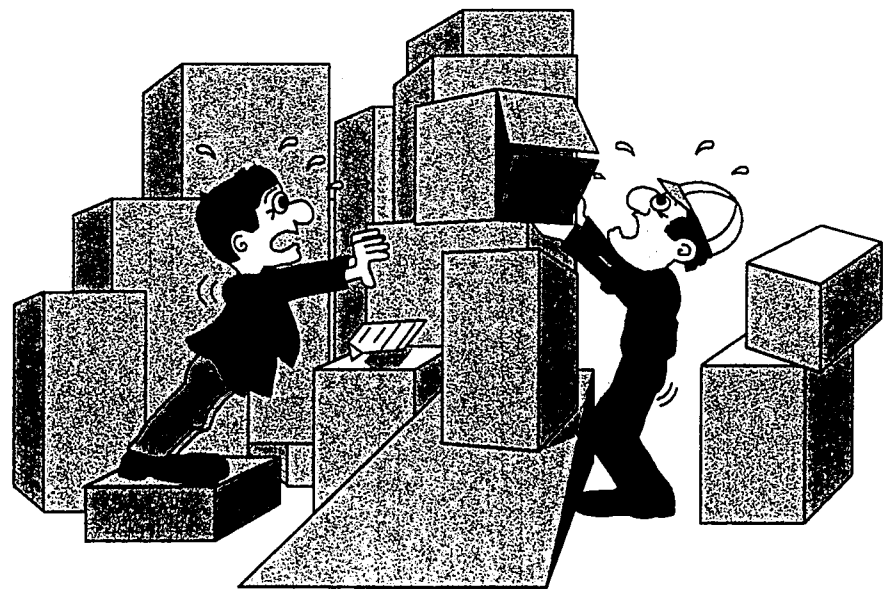


RCRA regulates disposal of HAZARDOUS WASTES

- Substances listed on an EPA list of Hazardous wastes (F, K, P, U)
- Characteristic wastes D001–D004
  (Ignitable, Corrosive, Toxic, Reactive)
- Mixed w/Haz Waste

Generator Status

- LQG >2200 lbs/mo.
  or >2.2 lbs/mo. *acute* HW.
- SQG
- CESQG



Haz Wastes we generate:

Metal filtercake (F006)

~~Flammable rags (D001)~~

Lead-containing debris (D008)

Universal Wastes:

Mercury-containing

Fluorescent light bulbs

Batteries

Chemical Investigation Team

CIT Member	Shift	
Incident Commanders (IC)		
Brian Thompson	1	5222, cell 777-1043, home 759-7589
Jami Gay	1	5350, home 767-1350, cell 689-5988
Audie Luna	1	5212, home 864-7438
Technicians		
Brent Breshears	1	
Erick Dunn	1	
Ken Stanford	1	
Kevin Creed	3	
Eric Marvin	2	
Mike Walker	1	
Rick Petit	2	
Rob Painter	1	
Tony Nida	2	
Operations		
Bert Shipley	1	
Bill Taylor	1	
Bruce Pruitt	1	
Bud Dresslaer	2	
Chuck Ewy	1	
Danny Akers	1	
Danny Rushing	1	
Jay Robinson	1	
Steve Hartje	1	

Aug-05

Weekend pager for Incident Commander in case of potentially RQ spill 836-0017

HAZARDOUS WASTE MANAGEMENT PROGRAM
CONTINGENCY PLAN

This information is presented in accordance with the requirements for a Contingency Plan per 40 CFR 262.34 and 265 Subpart D.

I. EMERGENCY COORDINATORS & Contacts

If an emergency situation develops at the facility due to hazardous chemicals or hazardous wastes, the discoverer shall contact maintenance or Security who will contact an Incident Commander (Table 1). If a incident commander is unavailable, another should be contacted until someone is reached. The Incident Commander (IC) has complete authority to commit resources of the company in the event of an emergency.

In all chemical emergencies, the Fire Dept. will be called, as a safety backup.

If the Fire Dept. does not respond, and/or the incident is beyond Litton's PPE limits/scope of response, Environmental Works will be called.

During Business Hours 890-9500

Non-business Hours 689-1940

EVACUATION PLAN

The IC is responsible for determining which emergency situations require plant evacuation. Prior to initiating plant evacuation, the IC shall notify the General Manager or highest ranking official available/present at the facility. Plant evacuation will follow the guidelines specified in the company's Emergency Action Plan.

When an Emergency situation is discovered an Incident Commander will be contacted. If no IC is onsite, those trained on emergency response will only help to mitigate dangers/facilitate evacuation until an IC arrives at the scene.

Spill Prevention, Control & Countermeasure
Plan (SPCC) revisions
2005

"Oil Handlers" training

An SPCC is a EPA required plan to prevent, control, and handle spills. Threshold quantities of oils, and lubes are what determine the need for this spill plan. This is part of the Oil Pollution Prevention Act (OPA), a reg that resulted from repeated oil spills and pollution of the ocean. There are revisions to this law that were recently made and we had to 'revamp' our SPCC and get it recertified.

Some of the definitions of this law, that determine if you need an SPCC Plan follow:
>1,320 gallon cut-off for ASTs---Only portable containers of oil w/55 gallon or more capacity are added into this cut-off, tanks above 660 gallons. (If you only have one 660 gallon single AST you are out of the rule.)

Definitions of the reg:

- Bulk Storage Container---Any container used to store oil prior to use, during use, or prior to distribution in commerce. (Excluded are oil-filled electrical, operating, or manufacturing equipment.)
- Aboveground storage capacity threshold previously was single containers w/capacity >660 gallons.
- Certifying Plan---Our SPCC must be blessed (certified) by a PE to be in compliance w/Part 112 requirements.
- Plan must be reviewed at least every 5 years. Unless reg revisions require otherwise.
- Inspections---may be 'usual & customary' records to serve as record of tests or inspections. Ours are on PMs.
- Training---Training for only oil handling employees annually.
- Inspection---Owner must test aboveground containers for integrity on a regular basis and when repairs are done.

Our OIL STORAGE FACILITIES:

☐ Used oil tanks	☐ Virgin oil storage	☐ Fuel storage tanks	☐ Others
500 gal.	(drums, totes)	300 gal. virgin diesel fuel	
300 gal.			

Access must be restricted/controlled. Ours are kept locked.

Oil spill prevention

Dikes, containment pallets, etc. Secondary containments.
Secondary containments /dike inspections are part of PMs

Oil spill cleanup/Mitigation

Bigger spill:

Dike/dam spill with absorbent socks.
Suck up oil/lube with vacuum, pump to used oil tank.
Mop with detergent to clean, so surface is not left slippery.

Smaller spill:

Use absorbents to clean up oils/lubes.
Mop with detergent to clean, so surface is not left slippery.

HAZARDOUS MATERIALS SECURITY PLAN

The purpose of this plan is to protect persons and property at the Interconnect Technology Division - Litton Systems Inc. plant in Springfield, MO. from the risks and dangers of hazardous materials in a criminal or terrorist attack. This plan evaluates/documents/establishes conditions to protect these people and resources to the greatest extent feasibly possible.

Risk Analysis

Over the years of operation, this site has been evaluated on several occasions for risks/hazards. Steps have been taken to eliminate or reduce risk factors. Hazards/risks at the site are itemized here, along with measures taken, to mitigate dangers.

Table 1. IDENTIFIED RISKS

Propane tank	Northeast of Plant
Ammonia cylinders	East & North side of Plant
Bulk Ammonia	2 tanks, 10,000 gallons each, virgin 1 tank 10,000 gallons, spent
Nitric acid	Totes, 55 gallon drums, some production bath vessels
Formaldehyde	Totes, production bath
Cylinder storage	East side of Maintenance shop
Used oil tank storage	North side of Maintenance shop
Sludge bins	Stored on north parking lot
Receiving Warehouse	Chemicals warehoused here until Production use

Table 2. Actions Taken to Mitigate Hazards

HAZARD	ACTION TAKEN
Propane tank	Fenced, locked, camera surveillance if warranted. Risk Management Plan (RMP) prepared in '01 with detailed hazard evaluation.
Ammonia cylinders	Locked, kept in segregated storage area
Bulk Ammonia	Inside, in areas under employee observation
Nitric acid	Inside, in areas under employee observation
Formaldehyde	Inside, in areas under employee observation
Cylinder storage	Fenced, locked
Used oil tank storage	Fenced, locked
Sludge bins	Stored at north edge of parking lot, inspected weekly
Receiving Warehouse	Inside, areas under employee observation

To reduce the risk of shipment of hazardous materials, these packages must be evaluated and approved by the Environmental Engineer or the Lab & Chemical Manager. An internal form is completed with shipping information and packaging/labeling is checked to insure DOT compliance, to increase security of hazardous material(s) shipped, and to document DOT shipments in addition to manifesting. When hazardous wastes are loaded for shipment offsite to a Treatment Storage Disposal Facility (TSDF) a member of the Environmental department is present to insure security of wastes containers and their handling.

A Security guard shack is located centrally on the north side of the Manufacturing facility. This is staffed 24 hours per day, 7 days per week. In case of a heightened security threat at facility, a plan is in place to limit traffic access to secure property.

Interconnect Technologies-Litton Systems shipments of hazardous materials are made with vendors having hazardous materials security plans to protect shipments. When vendor selection of a hazardous waste TSDF is made, security precautions and security planning is a factor considered. Audits are made of some TSDFs at the Litton Systems - Interconnect Technologies Division corporate level.

For those candidates under consideration for hazardous materials job positions, steps will be taken by Human Resources to verify that information on job experience provided by the candidate's application/resume is accurate. Positions requiring this verification are all Maintenance positions, Environmental/Waste Treatment operators, and Plating Maintenance.

Training

Training on this hazardous materials security plan will be given to HazMat employees and include: Interconnect Technologies-Litton Systems' security objectives and procedures, employee responsibilities, actions to take in the event of a security breach, organizational security structure.

Security staff will also be trained on observing/monitoring risks and their duties in case of an incident.

RCRA Test

NAME:_____
DATE: _____

1. RCRA stands for the **R**esource _____ **R**ecovery _____ law.

2. RCRA is to insure that wastes are: (circle those that apply)
   labeled &/or placarded
   identified
   packaged
   classified
   transported
   tracked with paperwork

3. RCRA law resulted from occurences of:
   a. dumping that contaminated water sources
   b. dumping wastes that contaminated homes and neighborhoods
   c. dumping questionable substances at night
   d. dumping in secret
   e. all of the above

4. RCRA Training is required for employees who _____ compliance with hazardous waste regulations.

5. Superfund and RCRA are the same thing. T F
   (Hint: Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) deals with Haz Wastes, too.)

TRAINING GUIDE

TOPIC: RCRA **HOURS:** 1

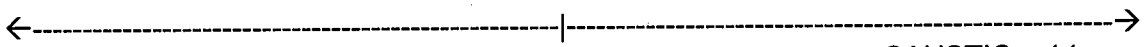
OBJECTIVES: To familiarize/review/answer questions with employees who affect compliance of Hazardous wastes.

PRESENTATION PLAN: Lecture w/Overheads

Handling chemicals requires special safety precautions. We have many chemicals that must be handled in the proper way to assure safety --- both to people and the environment

Handling---Be sure you are wearing the proper PPE. If you don't know, ASK.

- Safety glasses/goggles/face shield, gloves, apron/Tyvex suit, boots, etc.
- Acids (low pH)--add acid to water, never water to acid
- Caustic/base/alkali (high pH)--may burn without pain at first because they dessicate the tissue.



1- ACID 7 - NEUTRAL CAUSTIC – 14
Basic, Alkaline

Packaging---

Correct packaging/performance based packages is a DOT requirement.

- Cylinders - acetylene, oxygen, freons, nitrogen, helium, etc.
  Handling of cylinders—Must always be chained & upright
  Regs HM 126 & 181 extra precautions taken when transporting cylinders
- Drums
  Open top drums - Oil absorbent, sludge Are for solids
  Closed top w/bungs drums - oils and other liquids
  ANY DRUMS must have the lid & ring on, bungs in & tight. Drums must be labeled.

Storage---

- Segregate substances that may react by 20 feet or more
  Ex: Acids & Caustics

Flammables & Combustibles (Acetylene, O2, others)
Flammables & Corrosives (H2 gas)

Disposal---

- "EMPTY" defined per EPA means the residue in container is less 1" or 3%, whichever of these is less. This applies to all containers.

All DOT Hazardous materials must have correct, complete DOT shipping description and be labeled when placed in a container. This shipping description consists of:

1. Shipping name -- must be hazardous material specific
2. Hazard class -- IDs primary hazards 9 hazard classes + ORM
3. DOT ID# -- Identifies chemicals & appropriate emergency response
4. Packing group -- Chemicals with special packing hazards/risks are assigned a packing group # from 1 to 3. (Oneis most dangerous, three is the least)

Waste Classifications

HAZARDOUS Wastes are:

-A waste substance with one of the 4 types of "Characteristics"
(Corrosive, Flammable/Ignitable, Toxic, Reactive)

-"Listed" wastes in DOT, EPA regulations -Mixed with a haz waste (mixture rule)

9 Hazard Classes in HazWoper/DOT:

Explosives	Gases	Ignitable liquids
Flammable Solids/Spontaneously Combustible		
Oxidizers/Peroxides	Toxics	Radioactives
Corrosives	Miscellaneous	*ORMs (ORM-D)*

Emergency Response Procedures—If you notice a chemical that is spilled or in a place where it doesn't belong-------

Tell your Supervisor or call Security @5202. The appropriate people will be notified. Incident will be deferred to properly trained individuals on the Chemical Investigation Team (CIT).

Secure the area. That just means warn others not to enter the area, if you can do so without hazard to yourself.

If our CIT cannot safely handle an issue, we will get outside help:

Some spill Response tactics used by CIT and other response teams:

Stop the cause of problem (leak, reaction, etc.)
Containment to minimize quantity spilled
Confinement to minimize the area impacted
Adsorption/Absorption

Some Hazardous material mishaps could result in Fire.
Fire Extinguishing is based on the Fire Triangle (O2, fuel, temperature)

There are 3 types of Extinguishers: A--water & carbaloy

B--Foam, CO_2, Sodium bicarbonate
C--Halon
A,B, C Combo--contains Halon
(Type D is for metals and each metal has a different type of D extinguisher.)

Required for safe handling of Hazardous Materials
Hazardous Communications program
Label all chemical containers
MSDSs (in file cabinets)
Personnel training

Hazardous wastestreams generated here on site:

Wastestream
Metal filtercake (WWT Sludge)
Waste solids w/flammable liquids
Cyanide
Lead containing (A/O & PCBO)

Universal and non haz generated here:
Batteries
Mercury
Fl. light bulbs Router dust

Review of Contingency Plan / Evacuation Plans / SPCC Plan

All operators in areas w/satellite haz waste collection, all maintenance personnel and all environmental control dept.

TRAINER: Jami Gay **DATE: 6-23-05**

TRAINING ROSTER

TOPIC: Annual RCRA Training / HAZ MAT AWARENESS HRS: 1.0
DATES: 7/6/05

I have discussed & explained the topic listed above with the trainees listed below, and consider them fully trained. The attached lesson guide provides an outline of major points/instructions. If additional questions arise, they have been instructed to contact the area supervisor.

Trainer: Jami Gay Date: 7-6-05

I have attended the referenced training class and consider myself trained.

NO.	TRAINEE NAME (PRINT)	TRAINEE SIGNATURE	EMP. NO.
1	Suzanne Jones	Suzanne Jones	[redacted]
2	TERESA JONES	Teresa Jones	
3	BEVERLY DUNN	Beverly A Dunn	
4	Wanda Allcorn	Wanda Allcorn	
5	TERESA MORGAN	Teresa Morgan	
6	BARBARA RAYMOND	Barbara A. Raymond	
7	RODGER CARLSTROM	Rodger Carlstrom	
8	JERRY DICHE	Jerry Diche	
9	Erick Dunn	Erick D	
10	Robert Wagner	Robert Wagner	
11	FRANK THURSTON	Frank Thurston	
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TRAINING ROSTER

TOPIC: SPCC Plan training/Haz Waste Contingency Plan Awareness trng/Haz Materials Security Plan HRS: .5

DATE: 7/6/05

I have discussed & explained the topic listed above with the trainees listed below, and consider them fully trained. The attached lesson guide provides an outline of major points/instructions. If additional questions arise, they have been instructed to contact the area supervisor.

Jami Gay _____ Date: 7/6/05

I have attended the referenced training class and consider myself trained.			
NO.	TRAINEE NAME (PRINT)	TRAINEE SIGNATURE	EMP. NO.
1	Anthony NIDA		[redacted]
2	Richard PeHL		
3	JEREMY YARBROUGH		
4	Tim. Wiggs	Jim Wiggs	
5	Jim Mathis		
6	Bruce Hoffman		
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TRAINING ROSTER

TOPIC: SPCC Plan training/Haz Waste Contingency Plan Awareness trng/Haz Materials Security Plan HRS: .5

DATE: 7/14/05

I have discussed & explained the topic listed above with the trainees listed below, and consider them fully trained. The attached lesson guide provides an outline of major points/instructions. If additional questions arise, they have been instructed to contact the area supervisor.

Jami Gay _____ Date: 7/14/05

I have attended the referenced training class and consider myself trained.

NO.	TRAINEE NAME (PRINT)	TRAINEE SIGNATURE	EMP. NO.
1	Bruce Pruitt	Bruce Pruitt	[redacted]
2	Bill Taylor	Bill Taylor	
3	Chuck Phillips	Chuck Phillips	
4	PAULA VICE	Paula Vice	
5	Sherri Markofski	Sherri Markofski	
6	SANDRA STANSBURY	Sandra Stansbury	
7	Jerry Gilmore	Jerry Gilmore	
8	Marla R Clarkson	Marla R Clarkson	
9	HENRY COOK	Henry Cook	
10	Steve Lafayette	Steve Lafayette	
11	Steve Anderson	Steve Anderson	
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TRAINING ROSTER

TOPIC: Annual RCRA Training HRS: 1.0

DATES: 7-14-05

I have discussed & explained the topic listed above with the trainees listed below, and consider them fully trained. The attached lesson guide provides an outline of major points/instructions. If additional questions arise, they have been instructed to contact the area supervisor.

Trainer: Jami Gay Date: 7-14-05

I have attended the referenced training class and consider myself trained.

NO.	TRAINEE NAME (PRINT)	TRAINEE SIGNATURE	EMP. NO.
1	MIKE KINDEL	Kindel	[redacted]
2	Jesse Brown	Jesse Brown	
3	HAROLD DRESSLER	Harold Dressler	
4	Richard Heminy	Richard Heminy	
5	Charles M Freeman	Chas M Freeman	
6	Auston Rushing	Auston Rushing	
7	Tom Lyles	Tom Lyles	
8	Ron Hammons	Ron Hammons	
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TRAINING ROSTER

TOPIC: SPCC Plan training/Haz Waste Contingency Plan Awareness trng/Haz Materials Security Plan HRS: .5

DATE: 7/14/05

I have discussed & explained the topic listed above with the trainees listed below, and consider them fully trained. The attached lesson guide provides an outline of major points/instructions. If additional questions arise, they have been instructed to contact the area supervisor.

Jami Gay _____ Date: 7/14/05

I have attended the referenced training class and consider myself trained.

NO.	TRAINEE NAME (PRINT)	TRAINEE SIGNATURE	EMP. NO.
1	HAROLD DRESSLER	Harold Dressler	[redacted]
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TRAINING ROSTER

CC Plan training/Haz Waste Contingency Plan Awareness trng/Haz Materials Security Plan HRS: .5

8/16 /05

I have discussed & explained the topic listed above with the trainees listed below, and consider them fully trained. The attached lesson guide provides an outline of major points/instructions. If additional questions arise, they have been instructed to contact the area supervisor.

Jami Gay _____ Date:8/16/05

I have attended the referenced training class and consider myself trained.			
NO.	TRAINEE NAME (PRINT)	TRAINEE SIGNATURE	EMP. NO.
1	Jay Robinson	Jay Robinson	[redacted]
2	Brent Breshears	Brent Breshears	
3	Gary Lewis	Gary Lewis	
4	Ray White	Ray White	
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HAZARDOUS WASTE MANAGEMENT PROGRAM
CONTINGENCY PLAN

Revised: 7/18/2005

This information is presented in accordance with the requirements for a Contingency Plan per 40 CFR 262.34 and 265 Subpart D.

I. EMERGENCY COORDINATORS & Contacts

If an emergency situation develops at the facility due to hazardous chemicals or hazardous wastes, the discoverer shall contact Maintenance or Security who will contact an Emergency Coordinator (Table 1). If a coordinator cannot be contacted, other attempts should be made until a coordinator is reached. The Emergency Coordinators have complete authority to commit resources of the company in the event of an emergency.

TABLE 1: EMERGENCY COORDINATORS:

Jami Gay	Environmental Engineer	5350	767-1350	1738 New Hope Rd. Fordland, MO. 65652
Audie Luna	Process Engineer	5212	864-7438	712 N. West Ave. Springfield, MO. 65802
Brian Thompson	Safety Technician	5222	759-1350 777-1043 cell	541 N. Pima Fair Grove, MO. 65648

TABLE 2: EMERGENCY AGENCY PHONE NUMBERS

Fire Chief — **Emergency 911**

Springfield Fire Department — non emergency 864-1500
235 N. Kimbrough, Spfd. MO 65806

Springfield Police Department* — Emergency 911
321 E. Chestnut Expressway, Spfd., MO 65802 *(for EVAC purposes only)*

MDNR *(report spill only)** — 314-634-2436
Missouri Emergency Response Unit
P.O. Box 3133, Jefferson City, MO 65102

MO. Emergency Response Commission — **573-526-9100**
Department of Public Safety
P.O. Box 749, Jefferson City, MO 65102-0749

National Response Center — **800-424-8802**
Commandant G-DGC 2
USCG Washington, D.C. 20593-0001

Chemtrec — 800-424-9300

SECOR — 217-698-7247

EPA Region VII Administrator* 913-551-7876
726 Minnesota Ave., Kansas City, KS 66101

Joye McElwee
Greene County Local Emergency Planning Committee **869-6040**
833 Boonville, Spfd., MO 65802

Springfield Office of the DNR* 891-4300
2040 E. Woodland, Spfd., MO 65807

Cox Poison Center 800-366-8888
(in case of injured employees only)
Dir. of Public Information* 269-3070
Cox Medical Centers North
1423 N. Jefferson, Spfd, MO 65802

Environmental Works *(Cleanup backup for incident beyond Litton CIT's capabilities)*
Business Hours 890-9500 Non-business Hours 689-1940

National Weather Service 869-4491
5805 W. Highway EE
Springfield, MO 65803

Jill Palmer **703-875-8422**
Environmental Law (Fax) 703-875-8347
Northrop Grumman Corporation
1000 Wilson Boulevard, Suite 2400
Arlington, VA 22209

Those in bold must be contacted immediately after a release, fire, or explosion that threatens human health, the environment, or exceeds the RQ under SARA Section 303, 304 and as well as CERCLA 102.

*Per Northrop Grumman legal department on 7-17-05, according to USEPA, notification of the **National Response Center, State Emergency Response Commission, the LEPC or the Local Fire Department** must be made within 15 minutes of notification of the person in charge.*

The Environmental Dept. will be responsible to contact an Incident Commander, if one is not present at the facilityas soon as possible, so that notification can be made.

II. PREPAREDNESS

EMERGENCY EQUIPMENT

Location of emergency equipment is listed in a table below. This table includes the proper usage of each piece of equipment. This equipment is for use in containing and cleaning up spilled hazardous chemicals and waste. Fire extinguishers are readily available in each process area. All fire extinguishers comply with National Fire Code standards for portable fire extinguishers. Extinguishers are recharged after usage and inspected twice monthly.

For information on the communication and alarm systems see COMMUNICATION AND ALARM SYSTEMS this section.

Training on emergency equipment: Training on use of this equipment are given during training meetings to the Chemical Investigation Team.

Any repair or replacement of emergency equipment will be immediately arranged by the Environmental or Safety Department.

Monitoring equipment (Draeger pump and tubes) is available from the Safety Dept. and will be used by the EC to determine whether fume levels are permissible for employee exposure.

First-Aid is available thru any member of the First Aid Team (see Emergency Action Plan for details).

Emergency eyewash fountains and showers (used for decontamination) are located throughout the plant. Each unit consists of a drench shower and eyewash

TABLE 3: EMERGENCY EQUIPMENT

NAME	LOCATION	DESCRIPTION	USE
Lime/Sand	N. Edge of parking lot	Gray Granules	Spill control
Skid Loader	Environmental	New Holland ls150	Move lime/sand
Caustic Soda	Warehouse	White granule	Neutralize acids
Shovel	Environmental	Long handle	lime/sand/caustic
Bags	Tape Drill Maint	1 CY White Container	Misc.
Drums	Environmental	Blue or red plastic	Container

COORDINATION AGREEMENTS

1) Copies of response agreements are kept on file in the "Emergency Plans-RCRA Contingency Plan" blue binder in the Environmental Engineer's office at ITD-Litton Systems, Inc.

2) Copies of the Contingency Plan and any revisions made, are forwarded to the following:

Springfield Fire Dept. (SFD) -Springfield Police Department

-Lester E. Cox North Medical Center -Missouri Emergency Response Commission

-Greene County Local Emergency Planning Committee

EVACUATION PLAN

The Emergency Coordinator is responsible for determining which emergency situations require plant evacuation. Prior to initiating plant evacuation, the Emergency Coordinator shall notify the General Manager or highest ranking official available at the facility. Plant evacuation will follow the guidelines specified in the company's Emergency Action Plan.

AUTOMATIC WASTE FEED CUT-OFF SYSTEMS

Automatic hazardous waste feed systems shall be shutdown as deemed necessary by the EC.

COMMUNICATION AND ALARM SYSTEMS

Communication: For access to an outside line (for the purposes of contacting EC, police, fire, etc.) dial 9 and wait for the dial tone, then dial number desired.

Alarm: Pick up receiver, dial 87 to activate the intercom, announce nature of emergency & action to be taken.

Evacuation Alarm: Contact guard for initiating audible alarm for plant-wide evacuation.

Two-Way Radios: Two-way push button radios are also available for the CIT as needed.

MISC. INFORMATION

Locations of hazardous waste generatioons:

-Filter cake-sludge from Electroplating Processes F006—Waste Storage area in Environmental Dept. in Waste Water Treatment process area.

-Cyanide Wipes - D003 – in Gold Room

-Solder Bath Filters - D008 – in Environmental Dept. & Plating Maintenance

-Flammable Cloth Wipes- F003- in Pism & Photoprint areas

-Pads and Sponges – in Halco area

Haz Waste storage area is in the Environmental Dept. on North side of building.

There are two street accesses from Kearney Street and one on the west side from the Springfield-Branson Regional Airport Road.

RESPONSE GUIDELINES

All emergencies require prompt and deliberate action. In the event of any major emergency, it will be necessary to follow, as closely as possible, the plan outlined. However, in specific emergency situations, the Emergency Coordinator may deviate from the procedures to provide a more effective plan to bring the situation under control.

The employee discovering the emergency shall contact maintenance and security, which are responsible for containing the Emergency Coordinator. Maintenance or security shall then page for the "'Chemical Investigation Team' to.....area". The responding members of the CIT shall respond to the area announced in the page. In a safe area, the employee who witnessed the event shall inform a member of the Chemical Investigation Team (CIT) of chemical is involved, where it is, how much, and if there are any injured employees.

If a spill of hazardous material is confirmed, then the Incident Commander shall immediately set-up a command center near the release, directly upwind and a safe distance from the area. In the event of an emergency situation, the Emergency Coordinator will be notified first; subsequently all affected facility personnel. The appropriate federal, state or local agencies will also be notified. Initial response to any emergency will be to protect human health and safety, then the environment. Identification, containment, treatment, and disposal assessment will be secondary responses.

The Emergency Coordinator shall take the following steps:

-The Emergency Coordinator will immediately identify the character, exact source, amount and area of the extent of the release. If the release material cannot be identified, and if safety allows, samples will be taken for chemical analysis.

-The Emergency Coordinator will immediately assess all possible hazards, both direct and indirect, to human health or the environment.

-Determine if there are any injured personnel and determine rescue procedures.

-Assess if an evacuation of the immediate area is necessary, and if so initiate the evacuation.

-For small leaks/spills, isolate at least 50 feet in all directions.

-For large spills/leaks, initially isolate at least 100 feet in all directions. Keep all persons upwind of the spill.

-The Emergency Coordinator shall brief the Chemical Investigation Team (CIT) on the known scope of the problem.

-The Emergency Coordinator shall direct the response team to assess the potential health threat to any response activity. This includes having the hazard assessment technician for the team to do air samples. Based on data gathered and chemical(s) involved, the response measures will be determined.

-If the accident is beyond plant capabilities, the Emergency Coordinator will contact the appropriate agencies. The Emergency Coordinator shall NOT initiate clean-up action if there is a threat to human health as defined by 29 CFR 1910.120. This includes any potential for skin contact or vapor levels above the TLV/PEL in the response area. Under these conditions, rescue of injured employees will be forbidden and will be accomplished by responding fire fighters.

-If there is no significant health threat in the response area then the Emergency Coordinator shall work with the Chemical Investigation Team captain to develop a clean-up plan and initiate response.

-If a page to respond to a specified area is made, the Chemical Investigation Team and the First Aid Team will report to the area. The following personnel shall respond if summoned by the Emergency Coordinator : Resource/Logistics, Public Relations/Liaison, Safety Officer, Planning/Logistics, Finance, and/or Facilities.

Description of these groups and their function:

Chemical Investigation Team – It is this team's responsibility to do a health and safety assessment of the hazard area. They are also responsible for cleaning up spills within the scope of PPE and equipment on site and within their training. The CIT shall make efforts to clean-up releases remote from hazard that are within the limits of their PPE.

Operation Officer – Captain of Chemical Investigation Team.

First Aid Team - Their specific duties are specified in other company policies. In the event of a fire or spill involving chemicals, the Emergency Coordinator may use the First Aid Team or Fire Extinguisher Team for crowd control. Security may also be used in this capacity.

Resource/Logistics - These people will respond with the following materials as requested by the Emergency Coordinator (MSDS, technical data and additional personnel with technical skills). They will be responsible for supplying the responding Springfield Fire Dept. (SFD) personnel a current map of the facility. They may also bring technical literature to the scene.

Public Relations/Liaison - This individual will be responsible for interfacing with media and government officials. Mark Prevedel is the site's media contact.

Safety Officer - The Captain of the CIT is a safety technician. Any time it is suspected that the CIT is entering a dangerous situation, he/she has the authority to stop all emergency actions. If the SFD responds, they will inform the Emergency Coordinator when they feel the hazard threat to the SFD has increased.

Planning - Do the planning of how the necessary material for the clean-up activity will be acquired, transported and delivered to the CIT or SFD.

Finance - These people shall issue PO numbers and call in orders for any material needed by the Emergency Coordinator .

Facilities - The facilities team shall be composed of Operations level trained responders.

SKILLED SUPPORT PERSONNEL:

In addition to the actions of the CIT &/or Fire Crew, it may be necessary in the course of an incident to call upon the service of support personnel with special skills to perform temporary emergency support work. These personnel will be given an initial briefing prior to their participation and will be provided with any health and safety information provided to other employees.

SPECIAL CONTROL PROCEDURES

In IDLH conditions, areas will be evacuated and the incident will be turned over to the Springfield Fire Dept. An IDLH condition will result in death or permanent, irreversible damage after 20-30 minutes of exposure. Procedures below outline specific additional actions to be taken in certain situations.

FIRE AND/OR EXPLOSION:

The Incipient Fire Crew will be on standby during plant emergencies. If a fire should break out, concentration will be placed on preventing the fire from spreading to nearby areas. Firefighting effort will be continue until outside assistance has arrived, but the Incipient Fire Crew will only fight incipient stage fires. They will help with evacuation/crowd control on structural fires.

The following actions will be taken in the areas affected by the fire or explosion:

(1) Fire doors will be closed.

(2) Work in the area will be terminated immediately.

(3) All feed lines and equipment will be shut down, as necessary and practical.

(4) The Emergency Coordinator will be contacted.

(5) The area will be cleared of all personnel who are not actively involved in fighting the fire. These persons are to report to a designated point for accountability.

(6) All injured persons will be removed from the area to receive qualified medical treatment.

RELEASE OF HIGHLY FLAMMABLE MATERIAL (Ex: propane, natural gas):

The Fire Department will be asked to notify all persons within at least a quarter of a mile radius of the release.

All ignition sources within this ¼ mile area will be eliminated.

Use of motor vehicles within this area will be terminated or restricted to avoid ignition of vapors, which can cause a flashback to the source and initial explosion.

If the chances of an impending explosion are high, the entire area, within a 2,000 ft. radius of the source, will be evacuated.

Fire fighting will not be done at risk of injury to the persons involved, but early containment of incipient fires can significantly decrease total damage.

LEAK OR SPILL IN BULK STORAGE AREAS:

All feed lines to storage areas will be locked-out/tagged-out.

Immediately after the spill is detected, if possible, material will be transferred to the waste treatment system. If WT does not have treatment capability, a waste contractor may be summoned to remove any contaminated materials.

Material will be hauled to an approved TSDF for disposal.

If a chemical spill is not contained, an area of isolation will be established around the spill.

If the spill is large an initial isolation zone of 100 feet will be established. Small spills or leaks from a tank require evacuation of at least 50 feet in all directions to allow for cleanup, repair and to minimize exposure.

When any spill occurs, only those persons involved in cleanup operations will be allowed in designated hazard area.

If possible, the area will be closed or otherwise blocked off.

If the spill results in the formation of a toxic vapor cloud, (by reaction or by fire) and its release threatens human health outside the evacuation zone, then further evacuation will be mandated.

SHUT-DOWN OF PLANT OPERATIONS

In the event that the Emergency Coordinator finds it necessary to shutdown plant operations, the Emergency Coordinator shall contact the General Manager or the highest official at the facility, prior to this action.

Printed Circuit Board Operations is equipped with a warning system that has a specific alarm signal to initiate evacuation of all plant areas. In addition, the internal telephone system is used to notify/page key plant personnel as to the nature of the emergency and recommended action plan.

In the event that a plant evacuation is called for by the Emergency Coordinator, the following actions will be taken:

The signal for plant evacuation will be activated by Security (See Emergency Action Plan).

All personnel, visitors, and contractors will evacuate immediately through designated emergency exits.

No persons shall remain in or re-enter the location, unless specifically authorized by the person(s) calling for the evacuation.

All personnel are to be accounted for by their immediate supervisor. Supervisors will designate certain doors as the safest exits for his/her employees and will choose an alternate exit if the first choice is inaccessible. Departmental maintenance personnel carry radios that provide communication to Emergency Coordinator for safety/ accountability of all employees.

During exit, the supervisor will keep personnel grouped together.

Re-entry into the building will be made only after clearance given by the Emergency Coordinator.

Accountability:

-Immediate supervisors will be held responsible for those persons reporting to them.

-Visitors will be the responsibility of those employees they are seeing.

-Contractors are the responsibility of those Litton Interconnect Technologies employee(s) for who they are working.

AREA OF PLANT EVACUATION

Evacuation will be necessary in the case of a major fire or explosion. Specifics are outlined under "General Evacuation Procedures" in the EAP. All personnel have been notified of evacuation procedures and means of exit from their respective work areas under this emergency action plan.

Until evacuation is signaled, all personnel who are not in an affected area will remain in their respective areas.

Contract personnel and visitors will be cleared from the area and instructed to report to the guardhouse or the lobby area for accountability.

The Incipient Fire Crew Chief will be responsible for all fire-fighting efforts until outside firefighting assistance arrives. Then command of those efforts will be turned over to the Springfield Fire Department.

Supervisors of unaffected areas will stay with their personnel and be prepared to evacuate and account for all personnel under their supervision. An "All Clear" signal will be given when situation is mitigated and safety of personnel is no longer at risk. The Fire Crew Chief will determine when the emergency has passed and will consult with the Emergency Coordinator before the "All Clear" is given.

An area at least 500 feet wide and 1,000 feet long will be evacuated, downwind, if volatile materials are spilled or released.

II. POST-RESPONSE ACTIVITIES

PREVENTION OF RECURRENCE

Fires, explosions, release: Take action to prevent the recurrence and/or spread of fires, explosion, or releases.

b) Stopping processes and operations.

c) Collecting and containing released waste, and removing or isolating containers.

d) If the facility stops operations, in direct response to an emergency, the Emergency Coordinator will monitor valves, pipes, and other equipment for leaks, pressure buildup, gas generation or ruptures.

STORAGE/TREATMENT OF RELEASED MATERIALS

Immediately after an emergency, the Emergency Coordinator will make arrangements for treatment, storage, and/or disposal of recovered waste, contaminated soil or other contaminated materials.

INCOMPATIBLE WASTES

The Emergency Coordinator will ensure that wastes, which may be incompatible with the released materials are kept clear (not treated, stored, or disposed) until cleanup procedures are complete. Clean up will be arranged by Litton using their CIT or an outside contractor.

POST-EMERGENCY EQUIPMENT MAINTENANCE

After an emergency event, all emergency equipment will be cleaned so that it is ready for the reuse or, if needed, will be replaced. Before operations are resumed, all safety equipment will be inspected and ready for reuse. Clean up will be arranged by Litton using their CIT or an outside contractor.

REQUIRED REPORTS

As required by 40 CFR Section 265.56 (j), an emergency event (e.g., fire, explosions, etc.) that requires implementing the Contingency Plan will be reported in writing. The Emergency Coordinator will provide the necessary written reports, within one working day after the incident, to the following agencies: EPA, MERC, and LEPC.

AMENDMENTS TO THE CONTINGENCY PLAN

The Contingency Plan will be reviewed and immediately amended whenever the following occur:

-The facility permit is revised.

-The plan fails in an emergency.

-The facility changes in design, construction, operation, maintenance, or other circumstances, which increase the potential for fires, explosions, or releases of hazardous chemicals or wastes.

-The list of Emergency Coordinators changes.

-The list of emergency equipment changes.

RCRA TRAINING

All employees of Printed Circuit Board Operations who handle, or supervise employees who handle hazardous waste shall receive training annually. This training shall include, but not be limited to:

-The contents of this Contingency Plan.

-Hazardous Waste Management as specified in 40 CFR 260 and 10 CSR 25-4.261.

-Hazardous Waste Identification as specified in 40 CFR 261 and 10 CSR 25 – 4.261.

Generator requirements as specified in 40 CFR 262 and 10 CSR 25 - 5.262.

TSD requirements as they apply to larger quantity generators as specified in 40 CFR 264 and 10 CSR 25 - 7.264.

Specific hazardous waste management regulations as specified in 40 CFR 266 and 10 CSR 25 - 7.268.

Land ban regulations as specified in 40 CFR 268 and 10 CSR 25 - 7.268.

Infectious waste management under 10 CSR 86 - 7.

Waste oil requirements as specified in 10 CSR 25 - 11.010.

REPORT OF RELEASE, FIRE OR EXPLOSION

Name and Telephone Number of Caller:

_____ _____
Name Telephone Number

Name and Address of Facility
ITD--Litton Systems, Inc.
4811 West Kearney,
Springfield, MO 65803 417-829-5200

Directions: Give directions to facility (Fire and MERC only)

Date, Time, Duration and Type of Incident (Fire, Explosion, etc.)

_____ _____ _____
Date Time Type

Physical Form of Release: ____Liquid _____Gas _____Solid

Name and Quantity of Materials Involved:

_____ _____
Name Quantity

Is the item on the Extremely Hazardous Substance List (CERCLA 302) or the Hazardous Substance List (CERCLA 307)?

Extent of Injuries:

Hazards to Human Health or the Environment:

Is Evacuation of the surrounding area necessary?

Potential Routes of Migration:

Characteristics of Surrounding Soil:

Results of Sampling Performed:

Proximity of down-gradient drinking water, surface water, and populated areas:

Summary of Clean-up Plan:

Estimated Quantity and Disposition of Recovered Materials that may Result from the Accident:

_____ _____
Quantity Disposition

Reporting is only required if the event involves hazardous waste and is a threat to human health or the environment off-site OR exceeds the Reportable Quantity on the SARA Tile III list.

Give a statement that all emergency equipment will be decontaminated and functional prior to restarting the facility or operation in question.

Record of Emergency contacts made:

Agency Called	Time/Date	Contact Person	Report # if required	Comments
Springfield Fire Department			911 864-1500 non emergency	
Springfield Police Department			911 non emergency 864-1810	
Cox North 1432 N. Jefferson Springfield, MO. 65802 Cox Medical Center North 1423 N. Jefferson, Spfd, MO 65802			800-366-8888 Dir. of Public Information Poison Control Center 800-366-8888	
MO Emergency Response MDNR *(report spill only)* MO Emergency Response Unit P.O. Box 3133, Jefferson City, MO 65102			314-634-2436	
NRC National Response Center Commandant G-DGC 2 USCG Washington, D.C. 20593-0001			800-424-8802	
Greene County LEPC 833 Boonville Springfield, MO. 65802			417-869-6040	
Springfield Regional DNR 2040 W. Woodland Springfield, MO. 65807			417-891-4300	

"Wallace, Morley T. \(Ship Systems\)" <Morley.Wallace@ngc.com>, "Weeks-Kummer, Cynthia A. \(Newport News\)" <Cynthia.Weeks-Kummer@ngc.com>, "Weinstein, Nancy" <nancy.weinstein@ngc.com>, "Weiss, Anne" <anne.weiss@ngc.com>, "Wilson, Lee E. \(Continental Maritime\)" <LWilson@ContinentalMaritime.com>, "Wong, David F." <David.Wong@ngc.com>, "Yavno, Mike" <mike.yavno@ngc.com>, "ZZ-2005-07-01-Martin, Michael T \(Space Technology\)" <s103869@msst.ngc.com>

cc:

Subject: ALERT -- EPCRA and CERCLA Release Reporting Timeframes

Section 304 of the Emergency Planning and Community Right-to-Know Act (EPCRA) and Section 103 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) require that a facility report the release of a hazardous substance that exceeds the reportable quantity in any 24-hour period. Timely notification of a reportable release of a hazardous substance is required. Unfortunately, there is little guidance on what constitutes timely notification.

As a result of a reportable release at one Northrop Grumman operation, the Company recently learned that USEPA considers timely notification of a release to the National Response Center, the State Emergency Response Commission, the Local Emergency Planning Committee or the local fire department to be within 15 minutes. USEPA enforcement guidance specifically states that "ordinarily, delays in making the required notification should not exceed 15 minutes after the person in charge has knowledge of the release. Immediate notification requires shorter delays whenever practicable."

Please ensure that facility personnel responsible for reporting releases to the appropriate agencies are aware of the 15-minute notification requirement. Please also consider modifying your facility's emergency response plan to reflect this requirement.

EPA's CERCLA and EPCRA Enforcement Response Policy detailing this requirement is available at: http://www.epa.gov/compliance/resources/policies/civil/epcra/epcra304.pdf.

Please contact the Law Department with any questions regarding this matter.

Thanks!

Rita O'Brien
1000 Wilson Boulevard
Arlington, VA
(P) 703-875-8496
(F) 703-875-8347
rita.obrien@ngc.com

PUNCH LIST (abbreviated checklist)

Facility: Northrup Grumman Intervanned Techology **Date:** 02/06/05 **Arrival time:** 9:00am

DRIVE-BY

1. Drive-by conducted from public right-of-way? ☒ Yes ☐ No

Facility Orientation

2. Determine the direction "North" with respect to the facility and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way): →

3. Obvious concerns visible from public right-of-way (photos)? ☐ Yes ☐ No

- Containers
- Loading Areas
- Open Drums
- Unusual Odors
- Safety Concerns
- Tanks
- Unloading Areas
- Stressed Vegetation
- Obvious Discharges
- Other Concerns
- Processing Equipment
- Security Devices
- Unusual Staining
- Improper Disposal

SITE ENTRY AND INBRIEFING

1. ☒ Used main entrance ☐ Entered during normal operating hours ☐ Excessive delays (>15 minutes - denial of access?) - ☐ No

2. Facility Representative(s): Jami Gay Title: Environmental Engineer – Since Dec. of 2002
Richard Baker Title: Engineering Supervisor – Since Sept of 2000
Tom Lyles Environmental Controls Senior Technician – "Feb 97"

3. Does representative have intimate knowledge of all waste management practices? ☐ Yes ☐ No How long in position? _____

4. **Introduction:**

- ☑ Presented credentials
- ☑ Verified presence at correct facility (checked address/I.D. #)
- ☑ Explained authority to conduct inspection (Section 3007 of RCRA)
- ☑ Explained the purpose, scope, and order of the inspection
- ☑ Explained documentation process - worksheets, checklists, photo's, notes, statements, etc
- ☑ Explained facility's right to claim CBI
- ☑ Explained responsibility to provide accurate information and provided copies of Section 1001 and 1002 U.S.C. to facility
- ☑ Identified personal safety considerations: Desert Boots
- ☑ Completed Multimedia screening checklist
- ☐ Provided SBREFA handout
- ~~☐ Obtained GPS reading~~

5. Was full access granted? ☒ Yes ☒ By facility representative Other (name): Jami Gay

☐ No - Access denied Name of person denying access: _____ Time of denial: _____

Reason for denial, or limitations placed on access:

EXIT BRIEFING

1. Reviewed all data collected and documented all concerns or violations? ☑ Yes ☐ No

- Location of the violation, type and amount of waste involved, time frame, frequency, specific dates & when first started occurred
- Illegal units - unit location (diagram/picture), dimensions, conditions, construction material, gradient of the base (for spills), other information.
- Illegal disposal - how, when (each occurrence), where sent or disposed of, how shipped, who shipped, when shipped/disposed of, quantity

- ☑ Identified/verified violations from previous inspection were corrected (if applicable)
- ☑ Addressed all unresolved inspection related issues
- ☑ Summarized findings and observations for the facility representatives

NOV issued? ☑ Yes ☐ No ☐ Violations clearly identified and explained, including: circumstances, location, and applicable regulations

- ☑ Explained the importance of a timely (14 day) and adequate response
- ☑ Explained that findings and observations are based on your current knowledge of RCRA and that the final findings may differ
- ☑ Explained that compliance officer will make the final compliance decisions and that all compliance questions should be directed toward them
- ☑ Explained that recommendations provided are for informational purposes only and ***DO NOT*** require specific actions by the facility
- ☑ Provided facility with CBI form
- ☑ Prepared Document Receipt form

3. Specific information requested from facility? ☐ Yes ☑ No _____

4. Facility appears to have awareness of RCRA regulations and/or has its own environmental staff? ☑ Yes ☐ No

5. Facility has copy of applicable regulations? ☑ Yes ☐ No

6. Attitude and demeanor of facility representative(s): ☑ OK ☐ Not OK _____

MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM

LARGE QUANTITY GENERATOR INSPECTION CHECKLIST

L

FOR FACILITIES THAT GENERATE/ACCUMULATE > 1000 Kg (2,200 lbs. or approximately 5 drums, or > 2.2 lbs of acutely hazardous waste)

NAME	DATE	EPA ID NUMBER
Northrup Grumman Interconnect Tech.	12/06-07/2005	MOD 007152 903

ADDRESS	RR NUMBER	MO ID NUMBER
4811 west Kearney		

CITY	COUNTY	ZIP CODE	YEARS AT SITE	TELEPHONE NUMBER
Springfield	Greene	65803	3 Years	(417) 829-5350

DATE(S) OF LAST INSPECTION(S)	NUMBER OF EMPLOYEES
Feb/14/1995	330

FACILITY REPRESENTATIVE(S), TITLE(S)
Jami Gay – Environmental Engineer
Richard Baker – Engineering Supervisor

APPLICABILITY

USED OIL GENERATOR ATTACHMENT	RESOURCE RECOVERY ATTACHMENT	SUBPART
☒ YES ☐ NO	☐ YES ☒ NO	☐ AA ☐ BB ☐ CC ☐ NO
TANK ATTACHMENT	UNIVERSAL WASTE ATTACHMENT	EXPLAIN EXEMPTION(S) BELOW
☐ YES ☒ NO	☐ YES ☐ NO	

DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT

See Report

WASTE STREAMS

DESCRIBE EACH WASTE STREAM GENERATED (INCLUDING THE PRODUCTION PROCESS)	GENERATION RATE	EPA WASTE CODES	DISPOSITION
1. See Report			
2.			
3.			
4.			
5.			

A. GENERAL			COMMENTS
1. ☑ **Registered as a hazardous waste generator** - Section 260.380.1(1) RSMo and 10 CSR 25-5.262(2)(A).	1	GGR	
2. ☑ **Facility determines if waste is hazardous** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11.	1	GGR	
3. ☑ **Uses a licensed hazardous waste transporter** - Section 260.380.1(5) RSMo.	1	GGR	
4. ☑ **Uses authorized hazardous waste TSD or RR facility** - Section 260.380.1(7) RSMo.	1	GGR	
5. ☑ **Does not operate as a TSD** - Section 260.390.1(1) RSMo.	1	GGR	
6. ☑ **Facility has updated notification as required** - 10 CSR 25-5.262(2)3.B.	2	GGR	
7. ☑ **Materials are not accumulated speculatively** - 10 CSR 25-4.261 incorporating 40 CFR 261.1(c)(8).	2	GGR	
8. ☑ **Facility can demonstrate legitimate recycling** - 10 CSR 25-4.261 incorporating 40 CFR 261.2(f).	2	GGR	

PART 1: WALK-THROUGH INSPECTION

B. PRETRANSPORT, CONTAINERIZATION & STORAGE			COMMENTS
1. ☑ **Storage does not exceed 90 days or 180/270 days if facility accumulates ≥ 1000 Kg** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a).	1	GPT	
2. ☑ **Containers in good condition** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.171.	1	GPT	
3. ☑ **Waste compatible with container** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.172.	1	GPT	
4. ☑ **Containers closed in storage** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.173(a).	1	GPT	
5. ☑ **Containers storing incompatible waste separated or protected from each other by a dike, berm or wall** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.177(c).	1	GPT	
6. ☑ **Container storage areas have a containment system if holding more than 1000 Kg of liquid hazardous waste** - 10 CSR 25-5.262(2)(C)2.D(I).	1	GOR	
7. ☑ **Base of containment system is impervious and free of cracks or gaps** - 10 CSR 25-5.262(2)(C)2.D(III)(a).	2	GOR	
8. ☑ **Containers protected from contact with accumulated liquids** - 10 CSR 25-5.262(2)(C)2.D(III)(b).	2	GOR	
9. ☑ **Capacity of containment system = 10% of waste volume or volume of largest container, whichever is greater** - 10 CSR 25-5.262(2)(C)2.D(III)(c).	2	GOR	
10. ☑ **Run-on onto the containment system is prevented or excess capacity is provided** - 10 CSR 25-5.262(2)(C)2.D(III)(d).	2	GOR	
11. ☑ **Accumulated liquids removed to prevent overflow of containment** - 10 CSR 25-5.262(2)(C)2.D(III)(e).	2	GOR	
12. ☑ **Containers of ignitable or reactive waste stored > 50 feet from property line (or meet requirements)** - 10 CSR 25-5.262(2)(C)6 referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265(2)(I)7 & 8.	2	GPT	
13. ☑ **Containers clearly marked "Hazardous Waste"** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3).	2	GPT	
14. ☑ **Waste packaged/labeled/marked per DOT during entire on-site storage period** - 10 CSR 25-5.262(2)(C)1.	2	GPT	
15. ☑ **Date of accumulation marked on containers** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(2).	2	GPT	
16. ☑ **Facility inspected and maintained (weekly)** - 10 CSR 25-5.262(2)(C)2.C(I) and (II) referencing 40 CFR 265.174.	2	GPT	
17. ☑ **Daily inspection of areas subject to spills, i.e., waste handling areas** - 10 CSR 25-5.262(2)(C)2.C(II).	2	GOR	
18. ☑ **Adequate aisle space is available** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.35.	2	GPT	
19. ☑ **Placards available for transporter** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33.	2	GPT	

B. PRETRANSPORT, CONTAINERIZATION & STORAGE (CONTINUED)			COMMENTS
20. ☑ **Precautions are taken to prevent accidental ignition or reaction of ignitable or reactive wastes, including confining smoking and open flame to specially designated locations and conspicuously placing "No Smoking" signs by ignitable or reactive wastes** - 10 CSR 25-5.262(2)(C)2.F(II).	2	GOR	

C. SATELLITE ACCUMULATION			COMMENTS
1) ☒ **Containers kept closed** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173(a).	1	GPT	- Step can/day can not closed Fully Photo #1
2. ☑ **Containers in good condition** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.171.	1	GPT	
3. ☑ **Waste compatible with container** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.172.	1	GPT	
4) OK ☑ **Quantities accumulated not exceeding 55 gallons (1 quart of acutely-hazardous wastes)** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1).	1	GPT	
3) ☒ **Satellite containers go to storage within 3 days of filling** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(2).	1	GPT	- 55-gallon container of paint related waste in sludge Press area Photos 2&3
2) ☒ **Container marked identifying contents and beginning date** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(ii) as modified by 10 CSR 25-5.262(2)(C)3.	2	GPT	Step can/day can not Labeled Photo #1
7. ☑ **Stored in satellite areas less than 1 year** - 10 CSR 25-5.262(2)(C)3.	2	GPT	Water Treatment/Environmental Lab equipment waste container — Photo #6
3) ☒ **Satellite containers stored at or near the point of waste generation and under the control of the operator** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1).	2	GPT	- The paint related waste comes from operations throughout the Facility

D. PREPAREDNESS, PREVENTION AND EMERGENCY PROCEDURES			COMMENTS
1. ☑ **Facility operated and maintained to minimize the possibility of an emergency** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.31.	1	GPT	
2. ☑ **Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.)** 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32 as amended by 10 CSR 25-5.262(2)(C)2.G.	2	GPT	
3. ☑ **Adequate water supply and fire control equipment** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(c) & (d).	2	GPT	
4. ☑ **Device in the hazardous waste operation area capable of summoning emergency assistance** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.34(a).	2	GPT	
5. ☑ **Telephone or two-way radio on-site and capable of summoning local fire or police department** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(b).	2	GPT	
6. ☑ **Communication and emergency equipment tested and maintained** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.33.	2	GPT	

PART 2: RECORDS INSPECTION

E. MANIFESTS			COMMENTS
1. ☑ **Facility uses manifest system** - Section 260.380.1(6) RSMo and 10 CSR 25-5.262(2)(B).	1	GMR	
2. ☑ **Manifests maintained for a 3-year period** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a).	2	GMR	
3. ☐ **Generator's MO & EPA ID Numbers** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(a) as amended by 10 CSR 25-5.262(2)(B)1.	2	GMR	
4. ☑ **MO Manifest document ID and consecutive shipment numbers** - 10 CSR 25-5.262(2)(B)2.A.	2	GMR	
5. ☐ **Generator's name, address and phone number** - 10 CSR 25-5.262(2)(B)1.	2	GMR	
4) ☒ **All transporters' names, phone numbers, MO & EPA ID numbers, license plate numbers** - 10 CSR 25-5.262(2)(B)1 & 2.	2	GMR	Manifest # 1009 + all Safety Kleen Manifest 14 Total for 2005

E. MANIFESTS (CONTINUED)			COMMENTS
7. ☑ **Designated facility name, address, phone, MO & EPA ID numbers,** - 10 CSR 25-5.262(2)(B)1 & 2.	2	GMR	
8. ☑ **DOT shipping name, Hazard Class and waste ID number (RQ - if required)** - 10 CSR 25-5.262(2)(B)1 & 2.	2	GMR	
4) 9. ☒ **Containers, quantity and specific gravity designated** - 10 CSR 25-5.262(2)(B)1 & 2.	2	GMR	Cubic Yards Only - WRC Manifest #
10. ☑ **Manifest signed and dated** - 10 CSR 25-5.262(2)(B)1.	2	GMR	
11. ☑ **Out of state manifests have all required MO information** - 10 CSR 25-5.262(2)(B)4.	2	GMR	
12. ☑ **Manifest returned within 35 days - or exception report submitted within 45 days** - 10 CSR 25-5.262(2)(D)2.C.	2	GMR	

F. LAND DISPOSAL RESTRICTIONS			COMMENTS
1. ☑ **Tests waste or uses knowledge of waste to determine if the waste is restricted from land disposal** - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a).	1	GLB	
2. ☑ **Dilution of waste to meet LDR treatment standards is not occurring** - 10 CSR 25-7.268(1) incorporating 40 CFR 268.3(a).	1	GLB	
3. ☑ **Notification/certification includes correct EPA hazardous waste number, corresponding treatment standards, manifest number, and waste analysis data** - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(b).	2	GLB	

G. PERSONNEL TRAINING			COMMENTS
1. ☑ **Personnel are trained to respond to emergencies including the use of alarm systems, emergency equipment and contingency plan** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(3).	2	GOR	
2. ☑ **Employees do not work in unsupervised positions until they have completed the training** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(b).	2	GOR	
3. ☑ **Training reviewed annually** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(c).	2	GOR	
4. ☑ **Program director trained in hazardous waste management procedure** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(2).	2	GOR	
5. ☑ **Personnel training plan on-site** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d).	2	GOR	
5) 6. ☒ **Gives job title, job description and name of employee filling each position** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(1) & (2).	2	GOR	- no job descriptions for Hazardous Waste Management
5) 7. ☒ **Written description of introductory and continuing training that will be given to each position** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(3).	2	GOR	
8. ☑ **Documentation of training completed by personnel** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(4).	2	GOR	
9. ☑ **Records of current personnel maintained until facility closure, former employee records maintained for at least three years** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(e).	2	GOR	

H. CONTINGENCY PLAN			COMMENTS
1. ☑ **Contingency plan maintained on-site** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(a).	2	GOR	
2. ☑ **Plan submitted to local emergency response agencies** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(b).	2	GOR	
3. ☑ **Emergency coordinator on-site or on call** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.55.	2	GOR	
4. ☑ **Plan describes actions personnel must take in response to fires, explosions or other releases of hazardous waste** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(a).	2	GOR	

H. CONTINGENCY PLAN (CONTINUED)			COMMENTS
5. ☑ **Describes arrangements with emergency response agencies** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(c).	2	GOR	
6. ☑ **Lists names, addresses and phone numbers (home and office) of emergency coordinator(s)** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d).	2	GOR	
7. ☑ **Primary emergency coordinator designated** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d).	2	GOR	
8. ☑ **List emergency equipment including description, location and capabilities** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(e).	2	GOR	
9. ☐ **Evacuation plan, if applicable, designates primary and secondary routes and evacuation signal** - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(f).	2	GOR	

CHECKLIST KEY

Check the ☑ if in compliance.

Circle the ◯ if not in compliance and provide comment.

N/A = Not Applicable.

An item emphasized by a black line on the left is a serious deviation from the requirements (Class I Violation).

An unemphasized item is a significant deviation from the requirements (Class II Violation unless conditions warrant Class 1).

COMMENTS: INCLUDE DISCUSSION OF FACILITY'S WASTE MINIMIZATION PLAN

CHECK ALL POTENTIAL MULTI-MEDIA VIOLATIONS AND IMPACTS (SPECIFY AND COMMENT BELOW)

APC	PDW	SWM	HW	WPC
☐ Fugitive Dust	☐ Taste & Odors	☐ Open Dumps	☐ Transportation	☐ Animal Waste
☐ Particulate	☐ Bacteria	☐ Littering	☐ PCBs	☐ Bypassing
☐ Burning	☐ Pressure	☐ Waste Tire Dump	☐ USTs/LUSTs	☐ Treatment Plant Operation
☐ Asbestos	☐ Color	☐ SLF	☐ Other	☐ Sawdust
☐ Odors	☐ Flow	☐ Other		☐ Sludge
☐ Toxics	☐ Toxics			☐ Single Family
☐ Other	☐ Other			☐ Ground Water
				☐ Storm Water
				☐ Toxics/UST
				☐ Other

COMMENTS

INSPECTOR'S SIGNATURE	DATE

MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM

LARGE QUANTITY GENERATOR INSPECTION CHECKLIST – USED OIL ATTACHMENT

L-O

NAME	EPA ID NUMBER
Northrup Grumman Interconnect Technology	MOD 007152903
CITY	MO ID NUMBER
4811 west Kearney Springfield, MO 65803	

USED OIL GENERATOR

(If Used Oil Processor, Re-refiner, Marketer, Collection, Aggregation Point, Transporter, or Transfer Facility, Please Use Appropriate Checklist)

I. USED OIL STORAGE			COMMENTS
1. ☑ **Used oil is managed properly and not disposed of into the environment or cause a public nuisance** - 10 CSR 25-11.279(2)(B)4.B.	1	GOR	
2. ☑ **Containers in good condition** - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(b)(1).	1	GOR	
3. ☑ **Containers storing used oil are not leaking** - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(b)(2).	1	GOR	
4. ☐ **Containers/aboveground tanks are labeled or marked clearly "Used Oil"** - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(c)(1).	2	GOR	
5. ☒ N/A **Fill pipes used to transfer used oil into underground storage tanks are labeled or marked clearly "Used Oil"** - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(c)(2).	2	GOR	
6. ☑ **Containers/tanks which are exposed to rainfall are closed** - 10 CSR 25-11.279(2)(C)6.	2	GOR	
7. ☐ **Clean up any spills or leaks of used oil** - 10 CSR 25-11.279(1) incorporating 40 CFR 279.22(d).	2	GOR	
8. N/A **Mixtures of used oil and hazardous waste are managed according to state hazardous waste regulations** - 10 CSR 25-11.279(2)(B)2.	2	GOR	

J. ON-SITE BURNING			COMMENTS
1. N/A **Burn only their own used oil or used oil from DIY'ers or exempt farmers** - 10 CSR 25-11.279(1) incorporating 40 CFR 279.23(a) as amended by 10 CSR 25-11.279(2)(A)1.	1	GOR	
2. N/A **Burn only in space heaters with design capacity < .5 million BTU/hr** - 10 CSR 25-11.279(1) incorporating 40 CFR 279.23(b).	1	GOR	
3. N/A **Combustion gases from the heater are vented to the ambient air** - 10 CSR 25-11.279(1) incorporating 40 CFR 279.23(c).	1	GOR	

K. OFF-SITE SHIPMENTS TO APPROVED COLLECTION CENTERS			COMMENTS
1. ☑ **Used oil is transported by transporters who have obtained EPA identification numbers unless one of the following is met** - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24.	1	GOR	
40 CFR 279.24(a)			
2. N/A **Transports used oil in a vehicle owned by the generator or owned by an employee of the generator** - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(a)(1).	2	GOR	
3. N/A **Transports no more than 55 gallons of used oil at any time** - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(a)(2).	2	GOR	
4. N/A **Transports the used oil to a used oil collection center that is registered, licensed, permitted, or recognized by a state/county/municipal government to manage used oil** - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(a)(3).	2	GOR	
OR 40 CFR 279.24(b)			
5. N/A **Transports the used oil to an aggregation point that is owned and/or operated by the same generator** - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(b)(3).	2	GOR	
OR 40 CFR 279.24(c)			
6. ☑ **Used oil is reclaimed under a contractual agreement (tolling arrangement)** - 10 CSR 25-11.279(1) incorporating 40 CFR 279.24(c).	2	GOR	

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